Guildford borough Submission
Local Plan: strategy and sites

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

December 2017

Document 1 of 12
Sections covered
Introduction
Key facts about the borough
Vision and objectives
Policy S1: Presumption in favour of sustainable development
Policy S2: Planning for the borough - our spatial development strategy
## Contents

1. Introduction  
2. Key facts about the borough  
3. Vision and objectives  
4. Policy S1: Presumption in favour of sustainable development  
5. Policy S2: Planning for the borough - our spatial development strategy
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Introduction
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2155</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Front cover
- typo small ‘b’ in Borough
- No plan period given on front cover

Page 5, Foreword
(1) It is necessary to have justified statements of fact within the opening comments. The Council Leader’s statement is not justified, for instance in Para 3 the comment is not evidence-based; rather it is a subjective statement, not yet justified.
(2) We welcome the firm commitment that infrastructure should be in place before development, but would add a half sentence break into the last sentence. A reword is required to include “infrastructure prior to occupation of the development”.

1.13 Neighbourhood Planning
This paragraph and its heading are misleading as it appears to refer to the development plan in its normal meaning, rather than neighbourhood planning. This should be re-worded if it is intended to refer specifically to neighbourhood plans. For instance the following could be considered “This means that the neighbourhood plan is the first consideration in determining planning applications....”

1.15 Key diagram
- It is not clear from this paragraph where to find this diagram; by name or web location

1.16 Evidence Base
We are concerned that not all new evidence has been taken into account as some documents in the evidence base are greater than 10 years old: eg. Sites of Nature Conservation Importance Evidence 2004-7, referring back to 1997, 20 years ago.
Another example is that of the Green Belt Purposes Schedule with the Green Belt and countryside study, which was identified as flawed in 2014 and has not been amended or corrected since that time. Despite the additional volumes added to that document, we have been unable to find any text in Appendices 3 through 8, in the Green Belt and Countryside Study, Vol ii Addendum of April 2014, nor does it indicate that any sub documents should be consulted.

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

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

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18631</th>
<th>Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Section 1 : Introduction and Assumptions

1.1 As identified in para 1.8 of the Submission Local Plan (“the Plan”) it is “also based on a collection of research and information documents called the Evidence Base”. Our principal concern with the plan is that the Evidence Base,
principally the Land Availability Assessment (“LAA”), the West Surrey Strategic Housing Market Assessment (“SHMA”) and the Green Belt and Countryside Study (“GBCS”) must now be challenged as no longer being appropriate since the Referendum result of 23rd June 2016 which will lead to the United Kingdom leaving the European Union. We have already seen a major fall in the value of the £ sterling, informed reports of 80,000 City of London jobs going to other European financial centres, and the fundamental question that we face is the free movement of labour within the UK and Europe, putting the economic future of the United Kingdom into a period of substantial uncertainty. Against this background the population growth figures in the SHMA, being 21,179 from 2013 to 2033 in para 4.12, resulting in a requirement for 693 new households per annum can only be described as highly questionable.

1.2 In particular in looking at para 4.16 of the SHMA, it states that 51% of the West Surrey population growth in the period is forecast to be natural (births v deaths), and 49% will arise from net migration. In looking further at GBC in para 4.24, Table 17 shows internal net migration as negative at a rate of 812 per annum, whilst international net migration is positive at a rate of 1229 per annum for the period. Thus net international migration exceeds the total forecast population growth in GBC for the period 2013-2033, being 24,580 (1229 x 20 years) compared with forecast overall growth of 21,179. Given the result of the referendum we feel that the GL Hearn SHMA must be re-addressed as it no longer has any credibility and thus the Submission Local Plan is flawed and should be revisited.

1.3 Whilst preparing this response to the Plan we have received two substantive and excellent reports on the SHMA from GBC Cllr Reeve and Mr Niels Laub together with a report (the NMSS report) from Neil McDonald commissioned by Guildford Residents Association. The credentials of Mr McDonald and his experience at DCLG are unquestioned and the NMSS report together with those of Cllr Reeve and Mr Laub clearly demonstrate that the SHMA must be revisited and the Plan be substantially amended before it is submitted to the Inspectorate. The NMSS report concludes that the “Objectively Assessed Need for housing should be taken as 510 homes a year over the period 2013-33, not the 693 homes a year suggested by the SHMA”. It would appear that the authors of the SHMA were unable to interpret the historic data on international migration and student movements, and in particular could not find a definitive answer to the extraordinarily large negative Unattributable Population Change (“UPC”) of 717 pa throughout the period 2001-2011 (see SHMA para 4.32). As GL Hearn state in para 4.32, of the SHMA “it is unknown why this difference has occurred” and that this large UPC would “suggest an overestimation of population growth in the components of change date”.

1.4 Whilst we understand that the task of analysis of the historic data is complex and difficult, we are very concerned that the Plan has been based on what can only be described as guesstimates rather than estimates of population growth. The analyses of Messrs Reeve, Laub and McDonald challenge the conclusions of the SHMA and this excludes the need to re-visit the economic growth and migration aspects resulting from the Brexit vote. We have chosen to emphasise the above point as a preface to our other comments, which seek to address the Plan as it stands and looks at certain details which are relevant to Shalford parish. However we hope that the Borough and the Inspectorate will reflect on the new reality post the Referendum and, frustratingly for all concerned, re-cast the Plan with appropriate new assumptions as the basis of the Evidence Base.

1.5 It is the belief of the Parish Council expressed in the earlier consultation that the method used to identify the quantity of land needed to meet the housing requirement of the borough is questionable, and goes against the guidance of the NPPF. This states that “Local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

The footnote to the NPPF lists specific policies including designated Green Belt, AONB, SSSI and sites liable to flooding or protected by the Birds and Habitats Directive. Guildford BC is proud to promote the fact that 89% of the borough is designated as Green Belt yet on this occasion chooses to disregard this very significant point. The NPPF states that only one of the above criteria needs to be met in order to justify a lower level of housing provision than the assessed need. However we consider that both criteria could be applied to the Local Plan because of the impact on the existing infrastructure and the local environment. The Borough Council is currently proposing over 13,860 dwellings, resulting in a need for 693 dpa over the 20 year period 2013-2033 (or well over 800 dpa if calculated over the 15 year period in which the new plan will be in operation). This figure needs to be reviewed with regard to balancing the housing need
against the impact on the Green Belt, the AONB, AGLV and other local protections as well as the ability of the existing infrastructure to cope with such development. The infrastructure proposals which have been published with regard to supporting this level of development across the borough, show that most of the proposed infrastructure work is in the latter stages of the plan period and the funding and execution of these works must be questioned. In our view the improved infrastructure must precede the development rather than follow it.

1.6 The Borough Council is keen to promote the theme of sustainability across its work yet seems to ignore this worthy principle in developing a Local Plan and focuses purely on Market Housing for which there is significant demand, not just from within the borough. Again the government guidance is that market housing numbers should be assessed to ensure that it does not conflict with policies within the NPPF. Looking forward it is clearly an argument that by ignoring the need for sustainability, the future of the very attractive borough that exists today and the quality of life offered to the current population will be lost for generations still to come. The Green Belt is such an attractive place for people to live that the Borough Council could not possibly hope to meet the demand for houses here in any sustainable way. One must also ask whether the Council should attempt to do this, so making homes more inaccessible for people who have lived in the borough for their whole lives. Like many other parts of the borough Shalford Parish Council recognises the problems facing local people looking for a home and would accept that perhaps this would be a justifiable use of Green Belt land. Likewise it acknowledges the suggestion that levels of Affordable Housing should be higher than the national requirement in new development and hopes that this could ease the pressure on Green Belt sites.

1.7 There have been recent examples of neighbouring authorities experiencing problems with their Local Plan submissions to the Inspectorate. As a result GBC’s focus seems to be purely on ensuring that the housing need number is robust enough to satisfy the scrutiny of the Inspector and there is little acknowledgement of the special circumstances of the borough mentioned above that allow for the reduction of this figure. As a result, it is possible that the Inspectorate could view the plan as showing inadequate regard to the Green Belt, AONB, AGLV and other protections of which the borough is rightly proud.

Assessing need

1.8 The proposed growth in population in the Plan as stated in para 2.3 from 137,183 in 2011 to 162,188 in 2033 is 18.2% over 22 years (approx 0.8%p.a.) as compared to growth from 124,900 in 1980 to 137,183 in 2011 which was 9.8% over 31 years (approx 0.32%p.a.). If this rate of growth were to be extrapolated forward it is clear to see that it is unsustainable in the context of the NPPF taking account of the constraints of Green Belt protection, and physical infrastructure limitations of the Borough. Such unrestrained development will affect the quality of life of future generations.

1.9 We fail to understand why 13860 new homes are required in the plan period to meet a population increase of 21,179. The population growth number is from para 4.2 of the SHMA (162,188 less 141,009). At the 2011 census 137,183 people were housed in 56,400 homes at a density of 2.43 per home. At the same population density of 2.43 it would appear that 8716 new homes would be required to house the anticipated growth of 21,179 and this would suggest only 436 new homes per annum. We understand that there is hidden homelessness at the moment but such an increase in housing stock cannot be explained by this factor alone. It appears that there is an over-reliance on the various consultants’ reports and that no-one has used basic arithmetic to check that the conclusion is sound.

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

Attached documents:

Comment ID: PSLPP16/1979  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )
The Plan is already out of date, with Britain leaving the EU many European laws that currently apply to this Draft will come under scrutiny these issues should be considered within the draft, and GBC should decide now which European laws they will uphold until the next plan.

With the possible return of many European citizens to Europe and possible recession projected housing numbers and growth should also be reconsidered.

How can GBC say you are producing a map for the areas you want to 'protect' i.e. the Green Belt and Surrey Hills and then take huge swathes of Guildford out of the Green belt by insetting, other sites, and the potential damage to Surrey Hills. The green belt belongs to the whole Metropolitan area, GBC are supposed to be the care takers of it.

The increased population from new housing is not sustainable when according to Gov figures 45% of Guildford borough commute and the current train (incl. car park) and roads infrastructure is already severely overcrowded.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1915</th>
<th>Respondent: 8848033 / Paul Gerrard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.3 When will the 2nd part of the Local Plan &quot;Development Management Policies&quot; be available for consultation? Presumably this part should be included in the consultation/submission schedule (e.g. Stages Of Preparing The Local Plan diagram at end of this section.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8740</th>
<th>Respondent: 8933185 / Peter See</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thank you for the opportunity to object and comment under &quot;Regulation 19 of the Town &amp; Country Planning (Local Planning) (England) Regulations 2012&quot; before submission of the Local Plan to the Secretary of State. Thank you also for all your hard work. This letter concentrates on some of the main points of the Local Plan. Objections are shown in bold. As in my letter of 10 September 2014, I feel that I must point out poor sentence construction, jargon and inconsistent 'house style' etc. I have typed the existing text followed by a suggested alternative, eg operate: operates. I hope that this will be constructive and helpful. 'Front Cover Normally, on a front cover, the word 'borough' would have a capital letter at the start of the word. In fact, your site maps all have the word 'Borough'. Your front cover is inconsistent and does not look right.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Also, it is somewhat unusual to have 'strategy' and 'sites' without a capital letter at the start of each word. Does this matter? Yes, I think it does. See 'Foreword' below.

Page 3 Contents (Infrastructure and Delivery)

Policy I1 (ie I for India I) can easily be misread as "Policy 11" (ie the number 11). Policies I2, I3, and I4 certainly look like policies I2, I3, and I4. Why not have "Policy IDI" (ie Infrastructure and Delivery I), to ensure clarity? See also pages 108-121.

Page 5 Foreword (and elsewhere throughout the Plan)

The trouble with the design of the title Local Plan: strategy and sites is that, with no capital letters, strategy and sites look like words belonging to the text, not belonging to the title. Why not make things easier for the reader? Again, you are being inconsistent, as Paragraphs 1.3, 1.6 etc have the title of your Plan in inverted commas (perhaps to help the reader overcome any confusion which you may have created by leaving out capital letters at the start of words in the title)!

Page 5 Foreword. 3rd Paragraph 'is necessary' makes poor sentence construction. Why not have 'It is necessary to have more affordable housing, sites for travellers and diversification of the housing stock through other means to help ensure that accommodation is accessible to all'. I am not sure why you have the words 'through other means'.

Enhancing our employment offer: Increasing the number of jobs including our rural areas: including prosperity in our rural areas.

1.13 Neighbourhood Planning operates: operate

Page 10 Key diagram Page 10 evidence base

Regarding the headings, why not Key Diagram? Why not Evidence Base? Your other headings on pages 10 and 11 have capital letters, at the start of words which form headings.

There is inconsistency with the use of capital letters in headings elsewhere in the Plan. 1.16 Evidence Base is comprised of: comprises

1.18 Monitoring Indicators

deliver against: deliver the

has: have

against: measured against

218 Housing

has informed: it shows in detail

2.23 Natural Environment

My comments:

As about 89% of the Borough is located within the Metropolitan Green Belt, the Secretary of State and the Public Inquiry Inspector should recognise that the number of new houses and other buildings proposed in the Local Plan should be greatly reduced.

• The Green Belt was established to meet a number of important needs, and those needs have not gone away.
- There should be no building on the Green Belt, except perhaps small scale, limited
- The number of houses and other buildings proposed in the Local Plan should be greatly
- It is not wise - or sustainable - to have huge numbers of extra buildings in the Borough of Guildford, to cater for a national population which is increasing at a fast rate.

2.34 Sustainability Appraisal CSA) and Strategic Assessment (SEA)

inform : help to form

Page 18 Guildford Borough Key Diagram

Objection to development and loss of Green Belt at Normandy and Flexford (and Blackwell Farm in respect of numbers and density of new homes). See pages 4-7 of this letter.

3.2 Spatial Vision

40% affordable housing is too high. It is unrealistic. You could say up to 40%.

clear distinction between urban and rural areas: (especially between Aldershot/Tongham/Ash to the west and Guildford to the east).

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

Attached documents:

Comment ID: PSLPP16/8805  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

Today I have handed to your staff a copy of my letter dated 5 July 2016, objecting to the 'Guildford Local Plan Strategy & Sites June 2016'.

In my letter I felt that I had to point out poor sentence construction, jargon and inconsistent 'house style' etc. I was trying to be helpful and constructive but, unfortunately, pointing out these 'mistakes' made the letter 25 pages long!

I know that mistakes are inevitable but I feel that there are just too many bad ones to make the document an acceptable standard.

There were many similar mistakes in the Draft Guildford Plan during 2014 (my letter of the 15 September 2016 refers). So it seems that matters have not improved.

Is it not possible for you to find somebody (perhaps from outside your Local Plan team) who can write standard English and who has a good eye for noting mistakes etc?

Perhaps I should mention that, if you locate my letter dated 5 July 2016, you will see that my main objection to the Local Plan June 2016 is that I am against new buildings on the Green Belt between Ash and Guildford (ie at Normandy and Flexford).

I would like to take this opportunity to thank you and your staff for all your hard work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/27</th>
<th>Respondent: 8933185 / Peter See</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Introduction</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1.14 Policies Map

Policies Map: Policies map

Some of the text was blue when I printed it. Should it not be black?

1.18 Monitoring Indicators

Why have you got 'against our objectively assessed need'? What does it mean? Do you mean measured against?

1.18 Monitoring Indicators

Why have you got 'against our objectively assessed need'? What does it mean? Do you mean measured against?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/41</th>
<th>Respondent: 11044481 / Alan Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I have read the plan, and am in general in favour. We also had the privilege of visiting the open day at the Council offices this past Saturday for a very constructive discussion.

In particular, the need for a greatly increased number of affordable housing, and maintaining affordable housing for the future, I see as very important. It is clear that the greatly needed increase in housing needs can only be met by building large scale developments which will also allow the Council to apply infrastructure demands on the developer.

I am in favour of development of the Wisley site - which I know well - and I have long thought it an obvious site for large scale development. Clearly, developments of this scale have large infrastructure needs in particular the A3 and increased bus and rail links. I support these proposals in the plan.

I don't see any plans to reduce car journeys, especially in the town centre, and would favour an increase in parking fees in the town centre, and reduced or no fees on the Park and Ride scheme, and am also in favour of congestion charging. Although I do understand that this is probably politically rather difficult.
All power to you for the plan development; ‘keep the faith’ and execute well. I will be writing to my MP (Anne Milton MP) to ask for her support for the A3 infrastructure development.

Thanks for the hard work so far.

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

Attached documents:

---

Comment ID: PSLPP16/39  Respondent: 15097569 / sally Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

I object

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

Attached documents:

---

Comment ID: PSLPP16/79  Respondent: 15097569 / sally Chandler  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

I disagree

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

Attached documents:

---

Comment ID: PSLPP16/2260  Respondent: 15274817 / Mike Partridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I wish to register strong objection to this proposed submission Local Plan primarily because it removes the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). Removing the protection of the Green Belt is likely to result in unnecessary urban sprawl between Woking and Guildford. I believe there are no special circumstances which justify these villages being removed from the Green Belt.

I also object to the Local Plan because I believe that the proposed additional 13,860 new houses is not sustainable. The local communities of Ripley, Send and Clandon don’t need these houses and the Wisley Airfield (A35) and Garlick’s...
Arch (A43) sites have no infrastructure, no railway stations and inadequate bus services. This development would result in large numbers of extra cars and car journeys in these areas. This, coupled with the narrow rural roads and no pavements is likely to make the lives of many local residents a misery.

I object to the development at Garlick’s Arch which would result in the loss of four existing successful rural businesses, which have operated successfully there for some considerable time employing local people.

The proposed Local Plan lacks provision for satisfactory improvements to infrastructure for the sites (Policy 11). Local services and utilities are already near to, or at, capacity and there is no provision to improve Clinics and other key public services to cope with the huge increase in houses.

I object to the Local Plan because of the substantial increase in traffic that is likely on the trunk roads i.e. A3/M25. I understand that Highways England have no plans to even start to consider improving the A3 before 2020.

For these reasons, I believe that the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

I wish these objections to be fully taken into consideration and urge you to amend the Local Plan accordingly.

I’m commenting from outside the immediate area affected by the Local Plan because I feel strongly that these proposed developments will not only result in considerably increased overcrowding of the commuter services into London which are already close to capacity during peak hours, but also to the loss of quality open areas, with public access, in this part of Surrey.

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

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

Document part: Key facts about the borough
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

**Comment ID:** pslp171/2583  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

**Key facts about the borough**

The changes to paras 2.13, 2.14a, 2.14b and 2.15 are welcome. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However it does not match the ambition of the Transport Strategy to ‘address the historic infrastructure deficit’.

Reference to the extent of commuting, a notable feature of the borough, should be reinstated alongside the infrastructure references.

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

**Attached documents:**

---

**Comment ID:** pslp171/2263  **Respondent:** 8557953 / Effingham Parish Council (Arnold Pindar)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

**Paragraph 2.10a Page 14**

It is one thing to recognise the pressure on existing rural infrastructure and the additional stress that will be caused by planned growth but quite another to resolve this problem for local residents and businesses. There is little flexibility in the narrow rural road systems that serve the many villages, especially in Effingham and Horsley, where the rural roads are too narrow to take the development traffic from the planned development of Wisley. The Parish Council is concerned that the safety of road users will be unacceptable and that further consideration needs to be given the need to reduce the housing targets for the villages.

**Paragraph 2.14a Page 15**

Our concerns over traffic congestion link closely to our concerns over the pressure on the infrastructure. We recognise that there are plans to improve the A3/M25 road junction but cannot see how improving the flow between these roads will make an overall cost effective improvement, as it is the traffic density that results in the roads having the reputation for being “car parks”. At peak times the two roads are barely operating and we are concerned that the extra traffic from the Wisley development and more generally will pass the tipping point for gridlock.

As acknowledged, most local rural roads are single carriageway and whilst mainly adequate for cars to pass in opposite directions, lorries often have difficulties in passing. We are particularly concerned about site traffic for the development of Wisley on roads, many of which do not have footways. We believe this to be a serious safety issue.

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

**Attached documents:**
Para 2.12. Our rail network and connections are here undereated. They are in fact exceptionally good, giving easy connections to anywhere in the country, in most cases without travelling via London. A commitment is needed to better exploit this considerable asset.

Para 2.13. It is not correct that “There is a reasonable network of cycle routes”; there must be an objective of creating new routes. Existing cycle lanes are also inadequate: they disappear just when the cyclist needs them most. While it is true that there is a “reasonable” network of footpaths the poor quality of these is a major problem, and there is a lack of basic facilities such as road crossings, and pedestrian priority; this discourages people, particularly the old and handicapped, from using this sustainable mode of transport.

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

Forward

a) In the Foreword to the plan we note the use of the word ‘CONTINGENT’ in paragraph 4. We agree that infrastructure should come first but we suspect this will act as a brake on development when regard is had to the failure to reach agreement with external agencies such as Highways England, failure to identify how to deliver greater power and water (supply and drainage), and a reliance in the amended Infrastructure Delivery Schedule (AppendixC) on developer funding for most infrastructure.

Ket facts

b) The Guildford Society agrees the introduction of paragraph 2.10a: “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough’s prosperity and quality of life. Many people are attracted to Guildford by the quality of life and environment...”

c) It is also worth noting that the IMD subdomain data (as illustrated by The Guildford Society in our 2014 response) points to some major areas of relative deprivation across the Borough. As a result, the Society has rerun the data for the Lower Super Output Areas (Annex 1). The Settlement Profiles Report should highlight these issues and the evidence should point to solutions rather than simply justifying policies and strategies.

d) The enhanced wording at 2.13 is somewhat complacent in its generic treatment of ‘most local roads in the urban areas’. Again, these should be informed by a robust and comprehensive Settlement Profiles Report, and solutions identified to ensure that health and social infrastructure is accessed by adequate footpaths, cycle ways and crossing points.

e) The Guildford Society welcomes the strengthening of 2.10a, 2.14a and 2.14b compared with the deleted 2.22:

a. Paragraph 2.14a correctly highlights the impact of the A3 on Guildford and approaches. It also points to urban congestion and highlights that “it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” There is, however a general failure in the plan and evidence...
base to highlight the problem with the gyratory system caused by so many junctions in short distances with no co-
ordination of signals in the town centre. There is also a failure to seek, in a twenty-year plan, to reduce the number and
restrictions of junctions in the town centre or even to recognise it is a major constraint for the growth of the Borough and
region.

b. Paragraph 2.14b identifies the challenges faced by bus operators and we don’t believe there is enough in the Local
Plan (Sustainable Movement Corridor notwithstanding) to make much difference to most bus services.

c) In clause 2.15 there is an implied criticism of Surrey County Council in considering the poor state of the road surfaces.
There is no mention, however, about the extent to which this poor state of road surfaces translates into a failure to provide
safe conditions for cyclists. Nor is there reference to the poor quality of pavements (including widths of footpaths both
by design and from poorly maintained boundary hedges), leading to a more challenging environment for walkers.

g) In paragraph 2.18 there is reference to the West Surrey SHMA: Guildford Addendum Report in 2017. We will refer to
this separately elsewhere in this response.

h) Paragraph 2.21 refers to house prices across the Borough, and the information is not disputed, but there is no
granularity to the data – the Indices of Multiple Deprivation point to areas where price differentials are much greater, and
other areas where property is more affordable – but where there are other. Social challenges. The Guildford Society has
called for a more detailed review of the settled areas particularly the Guildford Urban Area – to ensure that local planning
is plan-led and that the plan is evidence based.

i) The reference to the quantity of Council housing stock begins to highlight the shortfall in affordable housing in general
and the paragraph also highlights the need for a strong affordable housing policy with a robust up-to-date viability
assessment. The viability analysis dates from 2014 and the Guildford Society is very concerned that the amount of
affordable housing will fall a long way short of aspiration. For this to be the case even before the plan is adopted is deeply
worrying.

j) The deletion of 2.22 is replaced at 2.10a.

k) In paragraph 2.3, the forecast of population growth from 145,473 in 2015 to 167,126 in 2034 will be contested by
the Guildford Residents Associations (GRA). We have seen their analysis and agree with their conclusions. A copy
of the critique on the SHMA is attached to this document (Annex 2). This echoes the critique made by GRA and by us in
response to the previous consultations.

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

Attached documents:
| 2.13 | There is also a network of footpaths and bridleways forming a Rights of Way network which includes various routes that can be used by off-road cyclists. | Cut backs have resulted in issues for both horses and cyclists. In the summer months encroachment and in the winter months, flooding makes many routes impassable. | Comment |
| 2.14a | Note on congestion 'whilst most local roads are single carriageways with a lane in each direction, it is at their junctions that the free flow of traffic is most oftenimpeded during peak periods' | This is true, however this omits to say that road widths in villages and parts of the town are often inadequate for the size of vehicles which results in lorries using pavements or more than one lane. This affects traffic flow. Off street parking also places restrictions on busy roads. This is used in Waverley (Chalk Rd Godalming and parts of Binscombe) and creates issues with flow, forcing high volume traffic through the B3000 which already has high pollution readings. It also omits to take into account the possibility that some roads have reached capacity, especially at peak time. The b3000 in Compton has reached capacity at peak time and is close to maximum capacity for most of the day during the week. It does not acknowledge the knock-on effect of congestion on A3 / A31, which is rat-running which results in congestion on minor roads (B3000 Compton) and pollution. | Object |
| 2.21 -- Shortage of affordable housing | The para notes a shortage of affordable housing without putting this into context. That is to say what percent of people in Guildford find themselves unable to afford 'affordable' housing and omits to mention the shortage of 'social housing' or the impact that 'right to buy' has on social housing stock. | Needs putting into context |
| 2.35 | The addition of a full stop after this URL makes it unobtainable. It works fine without the full stop, but some may not realize this. | comment |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3258  Respondent: 8570273 / Fiona Curtis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However, it does not match the ambition of the Transport Strategy to ‘address the historic infrastructure deficit’.

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

Attached documents:

Comment ID: pslp171/277  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

At 2.33 you describe the role of the relevant LEP to Guildford Borough (Enterprise M3). For consistency, you might also make early mention of the Surrey Nature Partnership at this point in the document. The Partnership’s latest publications might then be referenced here, including Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) and The State of Surrey’s Nature (2017).

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

At 2.33 you describe the role of the relevant LEP to Guildford Borough (Enterprise M3). For consistency, you might also make early mention of the Surrey Nature Partnership at this point in the document. The Partnership’s latest publications might then be referenced here, including Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) and The State of Surrey’s Nature (2017).

Attached documents:

Comment ID: pslp171/2156  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2.3
These population predictions pre-date the EU referendum and were based on potential immigration figures continually increasing due to free movement. These predictions are no longer valid and must reflect the likely situation post 2016. Taking the averages from the National Statistical Office, population predictions over 20 years will only actually rise by 1.006% giving a projected total of 146,388 over the twenty year period; An increase of just over 1,000 in Guildford population. Taking the population census last growth figure [2001 -2011] of 5.8% [over 10 years] the number is 153,577 or an increase of 16,377, yet the GBC prediction is 21,653. Again GBC figures are way outside statistical probability. With no supporting evidence provided for the GBC calculations, one cannot tell how they arrived at such a high figure. Noting all figures quoted within the Local Plan are higher than the statistical probability of them occurring at this high level. We are happy to debate this matter further at the examination in public.

Employment

2.8
The wording of this paragraph suggests that there are 95,000 job vacancies not 95,000 employed persons. The wording ‘opportunities’ is incorrect.

2.10
The reference to skills shortage is a pejorative statement.

2.10a
Clearly this is a statement of admission of currently inadequate infrastructure [on many levels] thus this statement should make it very clear that the Local Plan must prioritise the provision of infrastructure, and planning permission must clearly state and prove it needs prioritising.

2.11
We suggest the following change: A3 replace ‘trunk’ with ‘primary route’ which is a more definitive description of this road.

2.14a
This statement needs clarifying: Guildford and urban areas: Burpham is not congested just at peak times, but generally due to the two lane funnel south towards the A320/A3 intersection. This statement should recognise this as a separate problem which will increase with current development proposals. This statement infers problems only exist on the A3 heading north when in reality the problem is as complex heading south on the A3 and through London Road and Clay Lane in Burpham, which are used as traffic congestion relief roads for the A3.

As a result there are corresponding problems with air pollution in Burpham, which has more traffic than Ripley village [which has the results of a 3 month study, demonstrating pollution levels in excess of internationally acceptable levels]. Therefore this should be monitored prior to any further ‘strategic’ development in the Burpham area.

2.14b
Previous representations have set out the importance of local buses stopping at Guildford main railway station. Despite this item being raised on numerous occasions, nowhere in the Plan is there a reference to a specific intention to ensure buses from all areas of the Borough visit the railway station as part of their standard routing; thus, fundamentally, failing to provide a sustainable integrated transport system.

Housing

2.18
As already discussed, existing evidence of housing need does not support the housing aims of the plan. The document calculations and background evidence sources have been hidden from view. Statistical assessment in comparison with other SHMAs around the country suggests that this document is fundamentally flawed. [See Local Plan summary at end of this document.]

2.21

Financial values become meaningless at the end of a 20 year plan period; we recommend that values are expressed as a percentage of national house prices rather than actual value so that this statement is always current.

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

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

---

Comment ID: PSLPP16/10611  Respondent: 8597281 / Guildford Freiburg Association (Peter Slade)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Key facts  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have the following comments on the Local Plan:

Para 2.13

1. There needs to be a greatly expanded network of cycle routes, as far as possible separated from vehicular traffic.
2. In many cases footpaths need to be improved and maintenance enhanced

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

Attached documents:

---

Comment ID: pslp171/860  Respondent: 8599201 / Richard D Jarvis  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts  
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

See attached file.

[text of attachment reproduced below]

The changes to paras 2.13, 2.14a, 2.14b and 2.15 are welcome. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However it does not match the ambition of the Transport Strategy to 'address the historic infrastructure deficit'.

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

Para 2.3 quotes the ONS population projection for 2033. There should be an addition stating what population the Plan is designed to serve in 2034.
Para 2.13. This states that "facilities to assist pedestrians in crossing roads are commonplace". Whilst it is difficult to argue with this statement we feel that they are insufficient and further crossings are certainly required in this parish on the A 248 and the A 281 for the use of both young and elderly residents. We also believe that changes in speed limits through the villages make it difficult for all road users to travel safely.

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

Any development that impinges on the Thames Basin Heaths Special Protection Area should be vigorously opposed. These are special environments and should not be impacted by a growth in human population. We need to adapt to our numbers by increasing the density of housing.

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

The Plan seems to be concerned almost exclusively with the well-being of the economy of the borough, the enhancement of the lives of the more deprived sections of its existing community, and the care of new-comers. All of these are concerns which can be supported, but the Plan seems to have neglected the well-being of the majority of its existing residents, which may be described as not deprived.

2.22 This paragraph has been deleted. Its first sentence was "Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough's prosperity and quality of life."

This deleted sentence summarises one of the main concerns of many existing residents, and its deletion should call into question the validity of the document's arguments.
It should be made clear that the increase in housing, economic activity, infrastructure etc. will result in a reduction in the quality of life of its existing residents: if this is not considered to be true, then the Plan should demonstrate that adequate measures will be taken to ensure that that is not the case.

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

Attached documents:

Comment ID: pslp171/693  Respondent: 8796321 / Nick Etches  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.

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

Attached documents:

Comment ID: PSLPP16/107  Respondent: 8823553 / Rick Day  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Key facts  
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

2.3 This population growth is speculative and based largely on increased student numbers and migration from the Greater London area. No account is taken of the UK leaving the EU. What policy allows Surrey University to grow its student population with carte blanch? The underpinning NPPF means that increased numbers just have to be catered for without any discussion over the merits of growth. The Borough is short of unprotected land so obviously there has to be a limit to growth at some point. What is this limit? It has NEVER been established nor even discussed. Just to protect a growth curve into the future and base a development plan on it is not planning for a better quality of life as required in para 2.22.

2.13 & 2.14 Many communities are NOT well served by bus and given the low density housing of most of the Borough are NEVER going to be. Therefore outside of urban areas car ownership is going to be >100% and road network should allow for this. Buses might be better if they were more local targeted at linking with rail stations (currently hardly served by bus). Shorter routes could mean they could be more frequent and reliable.

2.19 What are the growth targets they do not seem to be mentioned in the plan only that it must "respond positively to wider opportunities for growth"

2.21 Drive rents and prices down by properly taxing Buy-to-let owners and having realistic interest rates.

2.22 " stress caused by planned growth must be addressed" Were is the growth target laid down?

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

Attached documents:

Comment ID: pslp171/1097  Respondent: 8826177 / Charles Spence  Agent:  

Document page number 20
Paragraph 2.10a clearly states that ‘pressure on infrastructure must be addressed’. However, there has been no substantive change in the Infrastructure policies to address this. Specifically, nothing has been put forward since last year’s consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel. Additionally education and health care provision will need to be expanded. There is no provision in the plan for any of this other than through a hope that the CIL will enable this. However, the CIL will not raise enough to do this.

I cannot comment on legal compliance and duty to cooperate as these are technical requirements and it is not reasonable to expect a member of the public to comment on these items.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/18499  **Respondent:** 8826529 / Martin Barker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Key facts

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

Also in Key Facts, para 2.7, you note the high car ownership and levels of movement. We have the A323, A322, and A320 through our parish all of which suffer from significant congestion at present. A large increase in houses, let alone 71%, would not be sustainable with these roads.

Paras 2.20 and 2.21 sound very reasonable “… to look to a controlled realignment of the Green Belt boundary and development of a small number of strategic sites to allow us to provide for mixed and inclusive communities supported by new infrastructure” until one looks at what you are actually proposing for Worplesdon – strategic developments, which include a 71% increase in housing, a care home, a cemetery, a park and ride, a secondary school and community football ground and a great many traveller sites. All this in just one parish.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/11505  **Respondent:** 8900449 / David and Judith Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Key facts

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

I am very worried about the new Local Plan for the reasons listed below. would like to strongly object to the new plans for West and East Horsley and please see the comments below.

This was a lovely area to bring up our family and we feel that these changes would alter the character of the village for the worse.
1. Remove West & East Horsley from the Green Belt changing to a newly identified “village boundary.” This process is known as insetting.

2. Station Parade is designated as a “District Centre” which classification results from a complete misreading of the facilities in the village centre and would inappropriately target the area for future urban developments.

3. Extension of the boundaries of the settlement areas of the Horsleys. No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future addition al development

4. Major doubt concerning housing numbers. The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematical model which is not revealed in the plan. Nor, apparently to Guildford Borough Council. This SHMA target housing number is then further increased by GBC to give a population which is almost 70% higher than the official national estimates for population growth in the borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households – greater than any other single area in the Borough.

5. Where are the new jobs to come from for these new residents?

6. Much longer waiting times to see the doctor or go to the hospital.

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

Attached documents:

Comment ID: pslp171/809  Respondent: 8903841 / Anne Tutt  Agent:

I further object to some wording in the Local Plan 2017 such as:

FOREWORD

“place where people from all communities want, and are able, to live and work”. Guildford Borough Council’s council tax payers are not liable for “all communities” or the rest of the world. I may “want” any number of things but I do not expect my neighbours to pay for them in cash or kind.

And “special heritage and landscape. Protecting these qualities for future generations is a core theme of this plan”. The plans for development are directly contrary to “protecting these qualities”.

And “It is necessary to have more affordable housing” – I object to use of the word “necessary”. It is only desirable for developers and people who want new homes in the area. It is not “necessary” for the vast majority of existing people living here who do not want more housing of any kind in the area. If a need for affordable housing has been identified that does not equal more housing.

KEY FACTS – POPULATION

Since the amendment anticipates even larger population growth in the Borough, it is illogical to address that by enabling more homes to be built: surely providing homes for more people will simply result 20 years hence in yet more people needing more housing and making the situation even worse. Future people will be scathing of GBC for carrying on allowing building instead of dealing with the root problem.

KEY FACTS - INFRASTRUCTURE

Ditto. And an explanation should be given who would be expected to pay for such infrastructure changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I further object to some wording in the Local Plan 2017 such as:

FOREWORD

“place where people from all communities want, and are able, to live and work”. Guildford Borough Council’s council tax players are not liable for “all communities” or the rest of the world. I may “want” any number of things but I do not expect my neighbours to pay for them in cash or kind.

And “special heritage and landscape. Protecting these qualities for future generations is a core theme of this plan”. The plans for development are directly contrary to “protecting these qualities”.

And “It is necessary to have more affordable housing” – I object to use of the word “necessary”. It is only desirable for developers and people who want new homes in the area. It is not “necessary” for the vast majority of existing people living here who do not want more housing of any kind in the area. If a need for affordable housing has been identified that does not equal more housing.

Attached documents:

Comment ID: pslp171/86  Respondent: 8921793 / Graham Richings  Agent:

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

Para 2.1 I object to the word features being removed. This may mean that GBC can ignore historical features that may be of great historical value. I believe that this has been done with specific sites in mind and is devious on behalf of the Council or others with whom they have corroborated. There are for instance on the Blackwell Farm site foundations that are of great historic interest not to mention Ancient Woodland.

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

Attached documents:

Comment ID: pslp171/2153  Respondent: 8921793 / Graham Richings  Agent:

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

1. Key facts about the borough

Para 2.1 I object to the word features being removed. This may mean that GBC can ignore historical features that may be of great historical value. I believe that this has been done with specific sites in mind and is devious on behalf of the Council or others with whom they have corroborated. There are for instance on the Blackwell Farm site foundations that are of great historic interest not to mention Ancient Woodland.

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

Attached documents:

Comment ID: PSLPP16/10982  Respondent: 8926401 / Christine Medlow  Agent:
2.12 Our rail network and connections are underrated here. They are in fact exceptionally good giving easy connections to anywhere in the country, in many cases without travelling via London. A commitment is needed to better exploit this considerable asset.

2.13 It is not correct that “There is a reasonable network of cycle routes” - there must be an objective of creating new routes. While it is true that there is a “reasonable” network of footpaths there is a major problem that the quality of these is poor and there is a lack of basic facilities such as road crossings, and pedestrian priority; this discourages people, particularly the elderly and handicapped, from using this sustainable mode of transport.

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

Attached documents:

Comment ID: pslp171/871  Respondent: 8930209 / Ray Corstin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.

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

Attached documents:

Comment ID: PSLPP16/8749  Respondent: 8933185 / Peter See  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Key facts

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

Page 22 Society

Reduce unemployment: Unemployment

Need to: Accommodate

traveler: traveller

all identified: identified

Page 22 Environment

Mitigating the impacts of, and adapting to, climate change: Climate change

Add air quality, eg near schools.
See page 7 of this letter.

Page 23 Economy

Additional: Inadequate

Conference facilities: Shortage of conference facilities

Page 24 Infrastructure

public transport: public transport and cycle routes

Add: Lack of adequate, secure, well designed off-street car parks eg at Ash railway station

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/28</th>
<th>Respondent: 8933185 / Peter See</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[I have typed the existing text followed by a suggested alternative, eg:

outside of: outside]

2.10a Infrastructure

Local and Strategic: local and strategic

2.13 Transport and Accessibility

Rights of Way: rights of way

2.14a

both as it runs: delete these words

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

2.10a Infrastructure

Local and Strategic: local and strategic

2.13 Transport and Accessibility

Rights of Way: rights of way

2.14a

both as it runs: delete these words

Attached documents:
2.0 SECTION 2: KEY FACTS ABOUT THE BOROUGH

2.1 The sub-section titled ‘Housing’ refers to the SHMA at paragraph 2.18. Reference should be added to the full objectively assessed housing need identified within the SHMA (estimated to be 693 dwellings per annum).

2.2 Whilst we support the commentary set out in sub-section titled ‘Competing and conflicting demands’ (paragraphs 2.27-2.28) and how this is applied within the Local Plan, we question whether it is appropriate for this to be included in a section titled “Key Facts”.

2.3 The Local Plan includes the Key Diagram on page 18. We note that Green Belt is not included in this (whereas, for example, “Countryside” is shown). Whilst the designation of the Green Belt is shown on the separate Policies Map, MGH considers that it could be appropriate for the Key Diagram to include it as well.

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

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

**Paragraphs 2.8 – 2.10**

In paragraphs 2.8 – 2.10 under the heading “Key facts about the Borough” the plan provides an outline of jobs and employment.

The University supports the addition of text in paragraph 2.9, which explains that “The University of Surrey is also a significant employer in the borough.” However, the University considers that this statement could be strengthened to also make specific reference to the contribution that the Surrey Research Park makes to the borough. The following amended wording is therefore proposed:

“The University of Surrey and companies on the Surrey Research Park are also significant employers in the borough that provide for and secure the future of high technology companies in Guildford.”

There is a demand for good quality new employment space in Guildford, especially in the western part of the town to support the continued growth and success of the University and the Surrey Research Park.

The University notes and welcomes that the plan allocates land at Blackwell Farm (Policy A26) for new development as a sustainable extension to the town, to include land on which to extend the Surrey Research Park. This provision, along with the ongoing development of the University of Surrey at Manor Park, will provide a very strong base on which to develop Guildford’s contribution to the national economy.

The University agrees with the view expressed in paragraph 2.10 that many workers are unable to afford homes close to work, and considers that there is an urgent need to address this problem that risks undermining Guildford’s future prosperity. It is an issue which directly and detrimentally affects the University as an employer that relies on lower paid staff, many of whom are young, highly qualified researchers. This is an important task for the local plan, which should provide for more new homes to be built to increase supply, so that house prices do not continue to accelerate beyond growth in salaries.

**Paragraphs 2.11 – 2.15**

Paragraphs 2.11 – 2.15 under the heading “Key facts about the Borough” of the plan provide a broad outline of transport and accessibility issues.

The University experiences the issues associated with traffic congestion and sees the need to locate new development close to existing facilities and services, in locations that promote (and do not undermine) sustainable modes of travel and that can deliver improvements to key transport infrastructure.

The allocation of sites for new development should take into account sustainable travel. This suggests a focus on the town of Guildford, particularly locations close to the major employment and service hubs such as the town centre and to the west of the town around the University, Surrey Research Park and Royal Surrey County Hospital.

This cluster of activity in the western part of the town is already linked to the town centre by an existing high quality public transport corridor, and is identified by the borough Council as lying at one end of a Sustainable Movement Corridor that it is seeking to promote and upgrade. Development in locations that can link to and integrate with the Sustainable Movement Corridor should be favoured, and hence additional development adjacent to the University and the Surrey Research Park is appropriate. More remote locations, where services are limited, and the use of the private car to access services, employment and facilities in the town is more likely, should have lower priority.
Paragraphs 2.16 – 2.21

In paragraphs 2.16 – 2.21 under the heading “Key facts about the Borough” the plan provides a broad outline of housing issues.

The University agrees that housing is an issue of significant importance to the borough and that an appropriate amount must be provided to cater for the objectively assessed level of need. The University broadly welcomes the work that has been carried out on the evidence base in this area.

It is noted that the level of housing (13,860 new homes) that the borough is planning for equates to 693 dwellings per annum when spread over the 20 year plan period, which accords with the objectively assessed need identified for Guildford in the West Surrey Strategic Housing Market Assessment (SHMA) published in October 2015.

However, the University considers that the 13,860 homes figure should be regarded as a minimum (i.e. at least 13,860). This would not preclude additional sustainable development from coming forward during the plan period where it could be demonstrated that this made a positive contribution towards meeting the borough’s needs and if allocated sites were not likely to be delivered during the plan period. It would also allow the opportunity to address matters such as potentially increasing pressure to respond to changing housing needs arising from London. The University does not believe that the recent Brexit referendum result would justify reducing the housing number. Guildford is part of the South East and London and the South East are vibrant areas with significant existing housing deficits which are also showing very significant economic and population growth.

The University notes the commentary in paragraph 2.21 on house prices and affordability, and considers that high house prices associated with lack of housing supply have created an affordability problem that is leading to skill shortages in the borough. This is impacting upon the ability of the University and high technology businesses at the Surrey Research Park (and across the borough as a whole) to attract and retain the high quality staff required to underpin prosperity and success now and in the future.

The University also notes that salaries are too low to allow many people who are employed in Guildford to access the housing market in the town, which leads to many people travelling longer distances than they would wish to from more affordable locations. This practice is not sustainable as it leads to more traffic and associated congestion on the road network, and brings with it increased vehicle emissions and other impacts on the environment. There are also societal and economic impacts arising from the time spent and the cost of commuting that could be reduced if people had greater opportunities to live closer to their place of work. Continued failure to bring housing provision closer to need will exacerbate these problems. It is therefore important that the local plan is adopted without delay and provides for at least the objectively assessed need.

Paragraph 2.22

In paragraph 2.22 under the heading “Key facts about the Borough” the plan provides a broad outline of infrastructure issues.

The University is aware of the pressures on existing infrastructure in the town and wider borough. The University considers that new development can help to overcome existing infrastructure problems and deficits by providing additional investment. This is best achieved through large strategic developments that can provide new housing and employment along with new services and community facilities, and are large enough to fund infrastructure upgrades, rather than through a scatter of sporadic and piecemeal development that would contribute relatively little in this respect.

The University also considers that a pragmatic approach must be taken to phasing of development alongside infrastructure provision so that a proportion of new homes can be provided on strategic sites, where it is appropriate to do so, in advance of the completion of major infrastructure investment.

Paragraphs 2.27 – 2.28

In paragraphs 2.27-2.28 under the heading “Key facts about the Borough” the plan provides a broad outline of competing and conflicting demands.
The University agrees that there is a careful balance to be struck between meeting development needs and protecting the environment. The University therefore supports the proposed approach to a controlled realignment of the green belt boundary and the development of a small number of large strategic sites that are well located on the edge of the existing urban areas and with regard to existing transport corridors. Such strategic sites are best placed to provide a mix of development and to generate investment in appropriate facilities to meet their local needs supported by new and upgraded infrastructure. These strategic sites can better offer a high quality design focused on people, place and natural capital.

Key diagram

The University notes that land at Blackwell Farm is identified on the Key Diagram as a “Strategic Development Site” (SDS).

However, the boundary of the site in the Key Diagram does not match that shown on page 185 of the plan, which is associated with policy A26. Specifically, it seems that the north western part of the allocation, whilst shown as inset from the green belt, has not been outlined with the SDS notation. There should be an amendment to the Key Diagram to include the north western area within the SDS boundary.

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

Attached documents:
Affordable housing:

It is a shame that the areas deemed as sites for affordable housing will mostly, due to the prices of houses around the areas, be out of reach for many of the skilled workers you are trying to attract. The houses are also not all easily and cheaply accessible to the main Guildford area, leaving people more reliant on cars and increasing the traffic into and out of the main towns.

The average key worker is on a salary of approx £26,000 year, on a salary of this most homes in this area are out of reach. Even looking at schemes to help people buy property, to get a mortgage on this salary would be difficult.

If you are trying to attract workers to meet the lack of unqualified care staff in this area, to enable the higher than normal number of older persons within Surrey to be cared for in their own homes or care establishments, then the cost of the homes will have to be affordable to this level of salary too, approx £17,000. Something that will be difficult to achieve within the areas highlighted.

Affordable housing should be open to all, and because of the presumed cache of living in the green and pleasant area of Surrey, with the benefit of closeness to London, I am afraid that this will not happen. Leaving the current residents and workers of Guildford to again lose out to people who primarily benefit London.

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

Attached documents:

**Comment ID:** pslp171/239  **Respondent:** 11051521 / J and M Baylis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

2.3 The forecast of population growth from 145,473 in 2015 to 167,126 in 2034, 15%, will be contested by GRA. I agree with GRA’s analysis

2.8 “a cluster of gaming companies in Guildford town centre”. I wonder where the evidence for this is, and is it significant compared with employment elsewhere in the Borough?

2.10a, 2.14a, 2.14b: I welcome this strengthening compared with the struck out 2.22.

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

Attached documents:

**Comment ID:** pslp171/2658  **Respondent:** 11113249 / Holy Trinity Amenity Group (HTAG) (Bob Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
“On most local roads in the urban areas and in the villages there is at least one footway, and usually two.”

This is normal, but implies that there is no problem with footways. This is not true. They are not maintained, most curbing is now ineffective, and they are often too narrow – a problem aggravated by frontagers allowing hedges to encroach across much of the footway. We suggest this sentence is removed.

“Facilities to assist pedestrians in crossing roads are commonplace.”

This is also incorrect. There are some light controlled crossings, but not a single pedestrian priority crossing in the town. Many crossings at places indicated by dropped curbs and tactile paving are actually dangerous. Suggest replace “commonplace” by needed.

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


Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts

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

Section 2: Key Facts about the Borough

The NRA have no concern with the current content of paragraphs 2.1 – 2.35 per se. However, aside from the single reference made within paragraph 2.8 that ‘The tourism and service sectors, commercial services and manufacturing industries are also significant employers in the borough’ there is no recognition of the Borough’s leisure and visitor experience and the significant contribution this makes. Indeed, it is not until Section 4 of LP1 that the leisure and visitor experience is given substantive reference wherein paragraph 4.4.53 sets out the leisure and visitor experience is one of the fastest growing industries in the Borough which makes a significant contribution to Guildford’s economy. Indeed tourism alone is referred to generating over £330 million of income for local businesses and supporting more than 6,000 jobs (in 2014).

The NRA, being a provider and contributor to the Borough’s leisure and visitor experience would encourage greater recognition of the overall leisure and tourism industry within LP1 and for this to be rightly presented within Section 2 of the Plan and its establishment of key facts about the Borough.

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

Comment ID: pslp171/1663  Respondent: 13594401 / Sarah Haddy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

Firstly I would like to quote Councillor Paul Spooner ‘I want to keep Guildford as a very special place for all who live and work here’

I feel that this aim has been lost.
2.10a Infrastructure

2.13 – The pedestrian crossings in Burpham add to the very frequent traffic jams as the timings are badly set.

2.14b – You say there is congestion but your plans do not offer a solution, in fact will make it worse.

2.22 – I am concerned that this has been removed because it is vital not to ignore the pressure on existing infrastructure. Every day, including weekends there is congestion in Burpham, not helped by the new supermarket you recently allowed to be built. The plans for Gosden Hill Farm will not improve this difficult situation, in fact they will make it worse. It will have a detrimental effect on the quality of life in the area. Already there are many times, at least twice a day, when it is extremely difficult to drive in or out of the area and, because of the standing traffic the air quality is poor.

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

Attached documents:

Comment ID: PSLPP16/2547  Respondent: 15284353 / Anne and Ejgil Olesen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the plan

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

Attached documents:

Comment ID: pslp171/859 Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, we feel this does not account for more recent political and economic changes.

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

Attached documents:

Comment ID: pslp171/26  Respondent: 15457953 / Ian Symes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Paragraph 2.10a
This new (moved) paragraph understates the pressures on the local road networks in the villages. Many rural roads are too narrow especially in Effingham and the Horsleys to take continuous flows of development traffic and the increased traffic from the proposed new developments at Wisley. Rural roads are often so narrow that two cars must slow to pass and two lorries often cannot pass each other without going on pavements. This is a serious road safety issue and this point should be made in this paragraph. It means that developers must take the widths of local roads into account in their planning applications and seek to mitigate road safety matters. Infrastructure deficiencies need to be addressed by Surrey County Council or the developer before development work starts, especially where the rural road network is inadequate.

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

Attached documents:
2.13 This states that we have a reasonable network of Cycle Routes and footpaths! We strongly disagree and ask this to be corrected. There is no network, only a series of disjointed cyclelanes, too narrow to ride in safely, mounting footpaths and rejoining carriageways, and usually terminating for no reason with the word END written on the road. Basically telling cyclists to fend for themselves after that point! Some of the cycle routes are in a dreadful state of maintenance and therefore if any new routes are created their future maintenance must also be planned for. The above statement should be redrafted to say Guildford has a poorly connected array of cycle routes which in some cases are badly maintained.

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

Attached documents:

Comment ID: pspip171/916  Respondent: 17256513 / Guildford Environmental Forum (Adrian Thompson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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

In general, GEF believe that the 2017 Plan is a big improvement on earlier versions and that the reduced number of home planned (p21) and the reduction in planned increase in retail floorspace (p22) are welcomed as being improvements. However, in the detail, GEF have noted the following issues arising from changes to the Guildford Plan:

1. Clause 2.13 on page 13, accepts that “there is a fragmented and disjointed network of cycle routes, consisting of routes both on and adjacent to local roads, with the latter often comprising shared lanes for pedestrians and cyclists. Many cycle lanes and tracks are narrow and some are unattractive to the average cyclist.” Furthermore, clause 2.14b states that “A growth in cycling has occurred despite limited improvements to facilities for cyclists.” However, we have been unable to find proposals to improve this situation, which is unacceptable as this should be a very significant way to reduce transport emissions. Funding contributions are understood to be available from organisations like Sustrans.

2. On page 38, we welcome the changes to recognise the need for more family houses and accessible accommodation for older people. We believe that The Council could do more through the Council Tax system to encourage the use of empty houses and discourage the overinvestment in luxury houses.

3. GEF welcomes the additional clauing on page 61-63 to recognise the importance of Climate Change in planning policy. GEF would strongly recommend that:
   - Carbon emission targets should be set, as is the case in Woking, so as to set the framework for at least an 80% reduction in emissions by 2050. This requirement is set in law as a result of the Climate Change Act, 2008.
   - GEF believe that the performance against these emissions reduction targets should be monitored annually and action taken to ensure that the overall targets are achieved.

1. GEF welcomes the additional support on page 113-14 in respect of energy efficient CCHP systems.
2. **Biodiversity.** Clause 4.6.33 on page 134 of the Plan has been amended to state that:

   “A positive approach to the provision and maintenance of Green Infrastructure is crucial to the maintenance, protection and enhancement of biodiversity and wildlife in the borough, not least through the provision creation of new habitats and by linking providing connections between existing habitats. It can further assist in adaptation to climate change by providing pathways for species dispersal and migration, climate change adaptation through providing the cooling effects of tree cover, and in the natural management managing of fluvial flooding, for example, through floodplain re-connection and restoration, provision, connectivity and which can also result in the creation of new wetland habitats.”

GEF agrees with these changes, but GEF would recommend that, additionally:

   - The words “….without any one dominating over the others” should be added at the end of the new definition in clause 4.1.2a.
• In clause 4.5.20 the words “replace 110 litres/person/day” should be replaced by “less than 110 litres/person/day using fittings approval”. The evidence base for this alteration is the Gov.UK Approval Document G 2016 updates.
• In clause 4.6.28,
• At the end of clause 4.5.28a, we consider that the words “any CHP system should also help address power security system limitations in the town centre” should be added at the end of this new clause.
• After the word “restoration” in clause 4.6.33 that the words “and for retaining water for longer in upper catchment areas” should be added.
• In the next clause 4.6.34, the last sentence should be modified to “which is indicative of how much richer in wildlife the borough could become”. The evidence base for this is The State of Surrey’s Nature, published by the Surrey Nature Partnership 2017.
• We are pleased to note that GBC are “Planning a Green and Blue Infrastructure Planning Document
• The Council should immediately start developing a “Biodiversity and Green Infrastructure Strategy and Action Plan” for the period to 2034, which is much more specific in its aims than the draft Countryside Vision published in April 2017.
• The Council should appoint a Councillor with the title “Portfolio Holder for the Environment, Wildlife and Sustainability and Chair of the Council’s Climate Change Working Group”.

GEF believe that the recent publication of the Surrey State of Nature Report shows that Guildford should plan for a net gain in biodiversity and not accept the significant declines that were recorded in The Second State of Nature Report for the UK which was published recently. This shows that over the past 50 years, 56% of our species have declined and that 15% of those assessed are at risk of national extinction. The UK has lost more nature than the global average: we are now one of the most nature depleted countries in the world. As an affluent town, Guildford should be leading the way and thus ensuring that the Borough is a better place to live in 2034 than it is now.

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

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

Paragraph 2.13 overemphasises the facilities for pedestrians in the villages. In our village of East Horsley, except in the shopping parade, there is usually only one footway and in places these are very narrow and not safe to use. The footways are in poor condition and need repair. The statement that facilities to assist pedestrians in crossing the road are commonplace does not apply locally. There is only one pedestrian crossing in the whole village. The sentence on cycle lanes should be expanded to comment that on the majority of roads, there are no cycle lanes and in the majority of rural roads, especially through the villages, the roads are too narrow to accommodate cyclists safely.

I welcome the additions to paragraph 2.15, but the remainder of the plan is singularly lacking in a coherent plan to address the very poor state of the local roads in the borough. The proposed new housing developments will put a considerable additional temporary strain on the roads because of construction traffic, and a permanent additional strain from increased traffic in the future.

Vehicle Speeding is another transport issue that is not mentioned and needs to be addressed, especially with regard to any new developments, where 20mph limits should the norm in my view.

One important transport issue that should be mentioned in this section is the need to encourage more use of electric vehicles by the provision of electric charging points throughout the borough (not just in new developments) and ensuring that new developments must provide these, rather than just suggesting that they 'may' include such measures.

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

Attached documents:

Comment ID: pslp171/2117  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent:

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

Page 14 Para 2:13 Transport and Accessibility – Cycling

Albury Parish Council notes that no mention has been made of the increasing number of cycle events that take place in the Surrey Hills since the 2012 Olympics. Some, like Ride London, are organised events but many are not and most cause road closures, some for an entire day, over a large network of roads in the Borough. This has a negative impact on local residents who cannot access local facilities, and for those dependent upon social care in their homes or in need of emergency services. Competitors also use local roads to practice for events which slows the through flow of traffic substantially. Many local roads are no more than the width of one car. With increases in housing in the Borough this will inevitably attract more people to the Surrey Hills to pursue cycling as a leisure pursuit and as a means of transport to school and work. There must be infrastructure improvements to the roads to allow for the increased number of cyclists in the Surrey Hills such that local residents, visitors and businesses are not inconvenienced and road closures are unnecessary.

Page 16 Para 2:22 Infrastructure

Albury Parish Council request the retention of paragraph 2:22. Although Infrastructure is covered in more detail later in the Plan, the need for investment in improvements to Infrastructure cannot be underestimated and it is vital that this occurs at the same time as increases in housing and commerce.

Pages 19 and 20. 2 Maps. Map-Guildford Borough Key diagram 2016 and 2017

Albury Parish Council remains opposed to any changes to the Green Belt boundary and the removal of villages including Chilworth and Shalford, East and West Horsley from it. These areas including Gosden Farm in Merrow and Wisley.
airfield are all areas designated for "strategic development in the plan" with large numbers of new housing proposed. The Green Belt has always been afforded protection to prevent urban sprawl. Any additional building and traffic generated by areas now “inset” and other areas of Guildford Borough and Waverley Borough allocated for new build will have a negative impact on the natural quality and existing infrastructure of the retained areas of Green Belt, Albury Parish and the Area of Outstanding Natural Beauty of the Surrey Hills. These areas would need substantial investment in roads, buses and cycle routes to accommodate increased commuter and visitor numbers. The A248 on which Albury sits is the main road artery connecting south east Guildford, Cranleigh, Godalming, Shalford and Chilworth via the A25 with the A3 north of Guildford and vice versa. It also provides connection with the train line running from Guildford to Waterloo via West Clandon, Horsley and the newly proposed Merrow train station. The A248 in Albury simply cannot cope with increased traffic volume. Without careful planning to accommodate this, which is not included in this document, the increased traffic caused by new housing will have a detrimental effect on the Green Belt, Area of Outstanding Natural Beauty and Albury village and parish all of which are protected by panning policy and the NPPF. Please see further comments on infrastructure policies 4:6.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3523</th>
<th>Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)</th>
<th>Agent: Vortal Properties Ltd (Robert Symons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:     Proposed Submission Local Plan: strategy and sites 2017 / Key facts</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Vortal Properties are broadly supportive of the changes to the content of the plan and are specifically supportive to the changes made to Site A28 - Land east of White Lane, Ash Green

Key Diagram and Proposals Map (Paragraph 1.15)

In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see response to PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES 2017 - PART 2: SITES) and set within the defined Ash Urban Area on the Proposals Map, as well as its removal from the proposed area of greenbelt.

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

Attached documents:

Total records: 46.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Vision and objectives
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPP16/18093  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Our vision and ambition

Strategic Objectives

“To deliver sufficient sustainable development that meets all identified needs.”

The wording should be refined. No service provider “meets all identified needs”. As expressed this is not sustainable development.

“To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.”

An appropriate reference to Green Belt is required in line with the importance Government attaches to this.

An objective relating to being resilient to flood risk and climate change should be added.

“Reinforce Guildford's role as Surrey County's premier town centre destination whilst protecting and enhancing its cultural facilities and heritage assets.”

Wording should be refined to reflect the importance of adapting to technology-driven changes in retailing. We should signal this does not necessarily mean bigger is better. Premier is an odd word. Sustainable success is more important.

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

Attached documents:

Comment ID: pslp171/2584  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

Strategic Objectives

Concerns upheld

Spatial Vision

In line with our evidence and soundness comments, we do not support the revised figures for housing.
In line with our evidence and soundness comments and our previous response, we do not support the revised retail figures.

The last paragraph in the Spatial Vision statement refers to ‘early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period’. While it is correct that funding has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), but the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule. The final sentence of the Spatial Vision should be changed to read as follows: The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule.

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

Attached documents:

---

Comment ID: pslp171/2264  Respondent: 8557953 / Effingham Parish Council (Arnold Pindar)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

Section 3 Spatial Vision Page Page 21

We welcome the reduction in the housing target to 12,426 by 2034. However, we believe greater weight should be given to the constraints of infrastructure and Green Belt resulting in a further reduction in housing numbers. We note that our neighbouring Mole Valley District Council are consulting on a very much lower housing commitment which we believe takes more account of these constraints.

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

Attached documents:

---

Comment ID: PSLPP16/11403  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Para 3.2.

Housing Target Number. This remains too high, and is unjustified; it could result in a degradation of our area and our town centre. We fully support the analysis commissioned by GRA that predicts a need of 510 houses per year. We also request that the legitimate further constraints on this number, particularly that due to the Green Belt, be applied.

Public Open Space. The commitment to 250ha of new open space is welcome; our area, and the adjacent town centre is seriously short of open space. To ensure that this objective is pursued the mechanism for providing it needs to be set out, in particular the connection to SANGS. The need to provide more open space within easy walking distance of residential areas, including our own, needs to be part of the objective; the riverside frontage is an obvious area for more open space.

Additional Retail Provision. The proposed expansion of comparison-shopping floorspace (65,000sqm total, 45,000 sqm in North Street) is too high. There is no demand from residents for this magnitude of expansion, nor does it reflect
current retailing trends. In creating more jobs it will also increase housing demand; there is clearly a housing / employment imbalance which needs addressing. The priority must be to use land for housing, and to increase the everyday convenience-shopping provision needed by residents.

**Transport Strategy.** This must not be just aimed at encouraging visitors to use sustainable modes of transport, but also at residents and employees.

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

Attached documents:

---

**Comment ID:** pslp171/3522  **Respondent:** 8560097 / Ripley Carriage Ltd (Mr W S Burr)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

Spatial Vision

1.20 The comments raised on behalf of Our Clients in representations to the previous Local Plan in relation to the shortcomings of the Spatial strategy remain relevant.

1.21 With the current significant deficiencies in the provision of housing in the Borough it is essential that the Adopted Plan provides the necessary support to ensure both the timely development and maximisation of the potential of all Site Allocations.

1.22 Notwithstanding the adjustments to planned delivery, 5,200 of the additional 9,400 homes (55%) are still to be delivered on urban extensions and the planned new settlement at Wisley.

1.23 A number of the strategic sites are dependent upon the delivery of Highways England’s A3 Guildford scheme. As this scheme is only expected to be completed by 2027, a large proportion of housing supply is assumed to be built after this date (Para 4.11 Housing Delivery Topic Paper, June 2017).

1.24 The strategic releases will, therefore, take a significant time to come forward, and accordingly this places greater onus on the need, particularly in the short to medium term, to support the delivery of smaller sites which will often be easier and quicker to bring forward. The amendments to village boundaries (including Ripley), their insetting from the Green Belt and the specific support and encouragement for the early delivery of allocated sites, including Site A45, continues to be essential.

1.25 The Spatial Strategy must also be realistic in terms of what may be achieved from smaller sites in order to ensure that overly ambitious objectives do not stifle growth or provide a brake on development.

1.26 The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

1.27 It makes sense to focus initial growth in the plan period within and on the edge of existing settlements. Smaller pockets of development of up to 50 units can be subsumed within existing settlements and help to reaffirm their vitality and viability.

1.28 Such development will not normally trigger a need for significant investment in new infrastructure, beyond any site-specific requirements, and will thus be more deliverable earlier in the Plan period and can contribute at an early stage to addressing the Council’s current housing supply deficit.
1.29 It is important that the vision is viewed holistically and that no one component is to be afforded any greater or over-riding weight. This point should be made explicitly within the Vision text.

1.30 The Plan Vision should also adopt a holistic approach to new growth which maximises the opportunities to group together wherever possible; new housing with jobs and supporting services. Ripley is a prime location to fulfil this objective. Site A45 offers the potential for housing development during an early stage of the Plan Period and will also satisfy in part the objective of developing on previously developed land.

1.31 The potential of Site Allocation A45: Land to the rear of the Talbot, High Street, Ripley, should be maximised.

1.32 The conclusions raised in previous representations remain valid and have not been addressed by the amendments.

UNSOUND: The Plan Vision should be more flexible and should stand alone as a vision for the entire plan period. Given the failure over ten or more years to deliver the necessary levels of housing to satisfy demand it is essential that the plan provides the conditions for ALL of the identified Site Allocations to come forward as quickly as possible. The vision should be amended to specifically refer to the key role of growth in the villages (particularly in the early years of the plan) and the need for a flexible approach to development standards.

Recommended Additions:

We suggest the inclusion of the following text additions to the Plan Vision:

• Confirmation that the Vision is a holistic strategy and component parts are equally weighted;

• Jobs, growth and services should wherever possible be grouped together;

• A clearly stated priority for the redevelopment of previously developed land AND sites within or on the edge of existing settlements prior to the wider expansion of less sustainable sites.

• A less rigid approach to the application of development standards.

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

Attached documents:
the recently 2017 update) have not been available to the community despite several attempts to obtain it by FoI requests and EIR. We, therefore, support the analysis commissioned by GRA and reject the target proposed in this Regulation 19 draft submission local plan.

c. The third paragraph of the Spatial Vision is somewhat challenging. The Vision calls for the ‘preferred location for [housing]development is existing brownfield sites’. It says 3,000 units will be located in the urban areas and approximately 1,200 dwellings on non-strategic sites within and as extensions to existing villages. By definition, 8,226 homes will need to be on sites that are not urban, village nor village extension—almost twice as many. This is an indication of major planning failure in Guildford over the past twenty or so years. We see good signs of improvement, but the current Council remains hamstrung by its predecessors’ failures.

d. There are opportunities to densify housing on existing estates in the urban area. The evidence of Indices of Multiple Deprivation suggests there are some clear target areas for regeneration but the Council has shown no clear plans in this Plan period to bring any such development forward—even if the lead time is likely to take much of the Plan period. Failure to identify areas for substantial regeneration in the plan and during the plan period will inevitably lead to a need to raid the Green Belt again in the next Plan. This means that the redrawing of the Green Belt cannot be considered permanent and so fails the NPPF test for designating Green Belt land, which, as a legal requirement for development to take place, would make the proposed plan unsound.

e. The Spatial Vision identifies the ‘required provision of 240Ha of additional open space. We aren’t clear that this is specifically allocated anywhere in the plan or on the proposals map—this is surely an omission which would make the local plan unsound.

f. Paragraph 8 of the vision refers to the rural economy and, a few weeks into the consultation process the Council published a strategy document for the Rural Economy. The Guildford Society does not understand why this was not ready for the Regulation 19 consultation.

g. Paragraph 9 refers to a reduction in retail area (The Society remains unclear that the evidence base is robust in its assessment of need). The evidence base notes that there is a need across the Borough for 6,000 sqm of food and drink uses. This paragraph points to all of the Borough’s need being met on the single site at North Street. We suspect the evidence base is wrong but the plan does not seem to be correct, and so is probably unsound.

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

Attached documents:
### 3.1 Spatial Vision

**The plan therefore focuses on some development on large strategic greenfield sites**

<table>
<thead>
<tr>
<th><strong>3.1 Spatial Vision</strong></th>
<th><strong>Object</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>This is preceeded by the statement</td>
<td>I strongly object to this and the way in which it is presented without caveat.</td>
</tr>
<tr>
<td>Not all of the borough’s development needs can be met within Guildford’s urban areas.</td>
<td></td>
</tr>
<tr>
<td>The SHMA figures are flawed and hence the OAN is far too high. This combined with the lackluster approach to surface level car parking and other Brownfield sites as well as not applying permitted constraints has forced development outside Brownfield. The decision to build on Greenbelt was taken long before the evidence base or results of the SHMA were known, which could be seen as pre-determination.</td>
<td></td>
</tr>
<tr>
<td>If GBC placed equal emphasis on finding ways to gain an OAN that was not inflated but met actual need and on revitalizing brownfield sites and implementing policies for appropriate densities in urban area, the need to build on Greenfield or greenbelt would be limited or non-existent.</td>
<td></td>
</tr>
<tr>
<td>Only 30% of development is urban based and 58% is currently on Greenbelt. The statement about the need to preserve the character of Guildford would appear to apply to the town and not to the borough. The Hog's Back is an iconic landmark that can be seen and appreciated for miles by users of the A31 as well as walkers and riders. All the Greenbelt sites serve a useful purpose and the validity of the ‘sensitivity analysis’ is questionable given its 'tick box' approach to analysis.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>3.1 Spatial Vision</strong></th>
<th><strong>Object</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Over 240ha, equivalent to more than 330 football pitches, will be provided in perpetuity</td>
<td></td>
</tr>
<tr>
<td>This relates to land that will be used as green space for residents in new housing but makes no reference to the level of countryside that will be lost and what the net figure will be (the countryside is for the benefit of everyone and not just residents in new homes).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>3.1 Spatial Vision</strong></th>
<th><strong>Object</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 11 ha, comprising 30,000 sq m of premises for business use (including offices, research, development and design activities in any science) will be provided within the plan period.</td>
<td></td>
</tr>
<tr>
<td>I object to incredibly low density of this urban facility, which wastes more space than it actually uses. There are 10,000 square meters to 1 hectare and an area such as this could facilitate units that are 2–5 levels high, without compromising surroundings. This begs the question as to why 11 ha is required for what could fit on 1 or 2 hectares, if landscaped? The bigger question however is why density policies have been removed and why better has not been made of the Manor Park facility?</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>3.1 Spatial Vision</strong></th>
<th><strong>Object</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The role of Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey will be maintained and enhanced. The major town centre redevelopment of North Street will</td>
<td></td>
</tr>
<tr>
<td>The reduction in land / space given over to retail is insufficient given the national and indeed global trend to internet shopping. It is good to see that the number of flats has increased from 200 to 400, but this is not nearly enough. Small affordable units in a town centre setting are hugely desirable and more, could allow older people to down-size thus releasing much needed family homes onto the market.</td>
<td></td>
</tr>
</tbody>
</table>
include **41,000 sq m** of comparison retail floorspace together with **6,000 sq m** of food and drink uses and **up to 400 flats**.

3.1 Spatial Vision

The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport and to seek to reduce car traffic especially through the town.

The transport strategy does not include any traffic re-modeling despite the note by Mouchel that points out that traffic volumes are **UNDERESTIMATED** due to 3 flaws in the paper, none of which have been corrected. The use of traffic averages obfuscates peak time data. Issues relating to merging and X are also mentioned but have not been dealt with.

The **Transport Strategy (page 19)** states that there are NO requirements for AQMA in Guildford and that air quality improvements will be made 'where feasible'.

Despite our leaving the EU, government policies should remain in line with the EU and 'where feasible' for what should be a legal requirement is not good enough.

It should also be noted that it is likely that the environment dept. will recommend the implementation of an AQMA at the A3 end of Compton village in the near future. The transport strategy should be in line with the most recent Air Quality Report and be mindful of the consequences of traffic systems that push more traffic out into the villages where residential properties abut busy streets.

It is of great concern that the transport report makes no reference to Compton's problems and that the village had to fight for many years to gain access to equipment due to lack of resources in the department and that many other villages are still awaiting to be listed for monitoring. It is somewhat presumption therefore to say that Guildford has no requirement for AQMA's, although I would hope very much that this is the case.

It is of even greater concern that the lead councilor for infrastructure, Cllr. Furniss, publicly denied that Compton had an air quality issue and attempted to invalidate the initial results by suggesting the monitoring carried out by the environment dept. was erroneous. This claim was not endorsed by the environment dept. and when evidence was sent to Cllr Furniss to demonstrate the error in his way of thinking, he declined to comment.

I can see no evidence to demonstrate how some of the infrastructure proposals put forward to address concerns over congestion, will actually deal with the current problem and more traffic from growth? Minor tweaks of junctions appear
3.2 Spatial Vision objectives

<table>
<thead>
<tr>
<th>Subject</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unemployment</td>
<td>is not a key issue in Guildford.</td>
</tr>
<tr>
<td>Cost of homes</td>
<td>is influenced by proximity to London &amp; coast and strategic position. Providing more facilities is likely to INCREASE the cost of homes not decrease them. There is ample space on Manor Farm to house more students and the University should take responsibility for its growth programme and this should include the provision of adequate housing.</td>
</tr>
<tr>
<td>The plan FAILS to balance growth with protection as 70% of housing development is on Greenfield.</td>
<td></td>
</tr>
<tr>
<td>An independent report commissioned by Parish Councils shows that the 4 way junction on the A31 will not work and that congestion on the A31 will not be solved by this junction. Add several thousand extra vehicles to this and the impact will not only impact Guildford town but all surrounding villages, and Puttenham and Compton in particular. This was clearly demonstrated recently when the A31 west route was closed due to use of sub-standard materials and hot weather. Despite diversions being set up, traffic took the shortest route and Compton (an area that is likely to be within an AQMA very soon) saw traffic at a stand still from the A31 to the Withies at the far end of the village. The last paragraph in the Spatial Vision statement refers to ‘early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period’. While it is correct that funding has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule.</td>
<td></td>
</tr>
<tr>
<td>The final sentence of the Spatial Vision should be changed to read as follows: The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule, following an impact assessment of any proposed changes.</td>
<td></td>
</tr>
</tbody>
</table>

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

Attached documents:

Comment ID: PSLPP16/17334  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

We are very supportive of many aspects of the spatial vision. The Council should be applauded for positive efforts it has made to accommodate the OAN by redrawing its Green Belt boundary and planning for some significant urban and village extensions. The scale of the housing undersupply in the south east of England when measured against the various OAN assessments that have been produced to date is considerable (e.g. Brighton, London, Luton, Crawley, Oxford, Lewes, West Berkshire, Windsor & Maidenhead, Bracknell Forest to name just some). By planning to meet its own OAN in full Guildford is doing its bit to avoid making the situation worse in the south east.
It would be useful if the Spatial Vision was widened to consider what might be happening beyond Guildford’s borders, especially in connection with Woking. The Duty to Cooperate Topic Paper acknowledges that there is currently a shortfall of 225 dpa in Woking based on its current adopted Core Strategy. A reference to this, and how this may trigger the need for an early review (to commence in 2019) of Guildford’s Local Plan if Woking finds that it is unable to accommodate its own need consequent upon preparing evidence for a new local plan, would be most welcome.

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

Attached documents:

Comment ID: pslp171/3357  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

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

I recognise that consultation is limited to changes made to previous strategy and sites document. My constituency includes the majority of Guildford Borough, but does not include Ash, Ash Vale, Tongham or most of Normandy, and my comments will not cover changes to policies or sites in those areas.

The opening statement from the Leader of the Council reflects what most people in my constituency feel - that Guildford is a very special, beautiful place. Many of my constituents would also support: the desire to enhance and protect our natural and built environment; homes they can afford either to rent or buy; a good and vibrant jobs market; improvement in transport across the borough through increased travel options; preservation of our open spaces; enhancement of the river frontage in our town centre; and viable local shops. I would also highlight the importance of the Areas of Outstanding Natural Beauty, the Green Belt, the Thames Basin Heaths Special Protection Areas and also some of our undesignated countryside which enhance people's lives. This is consistently recognised in the correspondence I receive although this is outweighed by the number of people who write to me because they find it impossible to find a home to rent or to buy.

Transport: In Policies BT5 and BT6 it is good to see bus schemes added for significant bus networks serving Gosden Hill Farm and Blackwell Farm proposed sites respectively to match additional requirements for their site allocation policies.

2.13 – I was pleased to read additional emphasis on the needs of cyclists and at 2.14a/b on transport infrastructure needs Extension to Surrey Research Park – although slightly reduced, if this comes to fruition, the land allocated must be used for maximum result, and therefore better planned with better land use than the original Research Park development.

Redevelopment of the land used for surface parking must be considered. The University campus and the Research Park are attractively designed but with such a high demand for housing in an area close to the AONB and Green Belt it would be negligent not to re-consider the land use at both these locations

I am pleased to see town centre increase in number of flats, and I would reiterate what I have said before about increased town centre housing.

At 4.1.9a I support the strengthened need for a dependent link between delivery of necessary infrastructure and delivery of housing.

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

Attached documents:

Comment ID: PSLPP16/12096  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:

I recognise that consultation is limited to changes made to previous strategy and sites document. My constituency includes the majority of Guildford Borough, but does not include Ash, Ash Vale, Tongham or most of Normandy, and my comments will not cover changes to policies or sites in those areas.

The opening statement from the Leader of the Council reflects what most people in my constituency feel - that Guildford is a very special, beautiful place. Many of my constituents would also support: the desire to enhance and protect our natural and built environment; homes they can afford either to rent or buy; a good and vibrant jobs market; improvement in transport across the borough through increased travel options; preservation of our open spaces; enhancement of the river frontage in our town centre; and viable local shops. I would also highlight the importance of the Areas of Outstanding Natural Beauty, the Green Belt, the Thames Basin Heaths Special Protection Areas and also some of our undesignated countryside which enhance people's lives. This is consistently recognised in the correspondence I receive although this is outweighed by the number of people who write to me because they find it impossible to find a home to rent or to buy.

Transport: In Policies BT5 and BT6 it is good to see bus schemes added for significant bus networks serving Gosden Hill Farm and Blackwell Farm proposed sites respectively to match additional requirements for their site allocation policies.

2.13 – I was pleased to read additional emphasis on the needs of cyclists and at 2.14a/b on transport infrastructure needs Extension to Surrey Research Park – although slightly reduced, if this comes to fruition, the land allocated must be used for maximum result, and therefore better planned with better land use than the original Research Park development.

Redevelopment of the land used for surface parking must be considered. The University campus and the Research Park are attractively designed but with such a high demand for housing in an area close to the AONB and Green Belt it would be negligent not to re-consider the land use at both these locations

I am pleased to see town centre increase in number of flats, and I would reiterate what I have said before about increased town centre housing.

At 4.1.9a I support the strengthened need for a dependent link between delivery of necessary infrastructure and delivery of housing.

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

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

2.1 Spatial Vision

The plan provides for the delivery of 13,860 additional homes by 2033. Considerable effort has been undertaken by the Council to understand the borough’s housing needs through the Land Availability Assessment (LAA) and Strategic Housing Market Assessment (SHMA) and, for the purposes of this representation, we do not seek to challenge the Council’s conclusions in this regard.

- We agree that the preferred location for this development should be existing brownfield sites however; only 2,800 units are proposed by the plan for the urban areas which take advantage of the existing infrastructure and transport to the private car. Significant expansion is also planned to the Guildford Urban Area and around Ash and Tongham which takes advantage of the existing infrastructure and services.

- Much of the remaining provision is in a new settlement at Wisley (2,000 homes) and a significant expansion at Normandy and Flexford which will provide over 1,000 As noted within the plan, the delivery of some of these major sites is dependent upon major improvements to the M25/A3 interchange and the A3 around Guildford and therefore the houses will not be able to be delivered until the later years of the plan. Some of the larger sites may not be deliverable within the plan period at all should agreement not be received from the Department of Transport for the infrastructure improvements. Therefore, it appears the delivery of the required 13,860 additional homes may not be achieved by this plan.

- The plan also proposes almost 1,200 dwellings on non-strategic sites within and around existing villages and over 750 dwellings as extensions to existing villages. We agree that this is important because it will help offer a variety of housing in villages and help contribute to maintaining and improving local services and village facilities and services in their village and provide lower cost housing that their children may be able to afford and allow them to continue to live locally.

- A number of smaller more sustainable sites on the edges of villages have been identified in the past by the LAA and the Green Belt and Countryside Study but omitted from the Proposed Submission Local Plan, the Council apparently having concluded that the provision of the larger sites will limit the impact of new development to a few pockets within the borough. Given the majority of the proposed housing will only be deliverable towards the later years of the plan period (if ever) we consider that additional smaller allocated sites should be included within the document to meet the supply requirements for the shorter term (first five years in particular). As discussed in 2 it would make sense that the small sites which are promoted are those that are located in villages which benefit from existing facilities and offer alternative modes of transport to lessen the impact on the overstretched road network in Guildford. As an example, both Normandy/Flexford and Ash/Tongham benefit from railway stations with regular and direct access to Guildford on the North Downs Line. This will improve following the addition of the proposed station at the Surrey Research Park.

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

Attached documents:
Para 3.2

Retail provision

The 40% extra retail provision proposed for the High Street and especially North Street is both unnecessary and undesirable. What should be provided instead is more residential development in those areas.

Transport strategy

Additional and more frequent and cheaper public transport is needed throughout the Borough.

Much more renewable energy, especially solar, should be installed throughout the Borough.

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

Attached documents:

Comment ID: pslp171/876  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

While the text of the final paragraph in the box setting out the spatial vision has not changed, the schemes referred to have.

See attached comment.

[Text of attachment reproduced below]

The last paragraph in the Spatial Vision statement refers to ‘early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period’. While it is correct that funding has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), but the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule.

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

The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule.

Attached documents: [Chapter 3 Our vision and ambition, 20.7.17.pdf](89 KB)

Comment ID: pslp171/1084  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

The number of additional homes to be delivered by 2034 has been changed to 12,426. This number is based on the GLHearn Addendum to the SHMA which is flawed. Further work is needed to arrive at a more soundly based number,
but on the assessment made by Neil McDonald, the demographic need is for 404 houses per annum, allowing for rounding up the calculation for the years to 2034, the provision in the plan should be reduced to 8,000.

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

Attached documents:

Comment ID: pslp171/1085  
Respondent: 8599201 / Richard D Jarvis  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

The scale of comparison retail floorspace provision in the North Street development has been changed to 41,000 sq m which is a move in the right direction, but not enough. The quantity should be scaled back further, in recognition of the trends in retailing and taking into account the existing retail space in the town centre.

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

Attached documents:

Comment ID: PSLPP16/17289  
Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)  
Agent: JB Planning Associates (John Boyd)  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Representation on Spatial Vision

Introduction

The Spatial Vision makes provision for 13,860 dwellings by 2033. Over 2800 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car.

The Plan also proposes almost 1200 dwellings on non-strategic sites within and around existing villages, some of which are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages.

Reference is made to the fact that the growth proposed in this plan is predicated on the delivery of the necessary infrastructure. The Infrastructure Schedule accompanying the plan (Appendix C) outlines the key infrastructure needed to support the development planned, focussing particularly on the first five years of the plan period and the strategic development sites.

Delivery

It is evident that the delivery of a number of allocation sites will be dependent upon the provision of major new infrastructure such as new railway stations and associated works to boost network capacity, and highway improvements. We note that in terms of the A3 Guildford both the A320 Stoke Interchange Junction to A31 Hog’s Back Junction (SRN2) and the M25 Junction 10 / A3 Wisley Interchange ‘Road Investment Strategy’ (SRN3) are both costed at £100-250 million. We consider that highly expensive infrastructure provision requirements for major allocations means that there will need to be much more of a focus on the allocation of smaller and medium sized sites to ensure housing delivery is boosted over the early years of the Plan period.
Whilst the Vision refers to meeting the identified growth needs of the Borough in terms of housing, employment, retail and leisure, it fails to mention the Duty to Co-operate, and the need to ensure that the unmet housing needs across the wider West Surrey Housing Market Area are met (Guildford, Waverley and Woking), which in the case of Woking, has been identified as being 3,150 homes to 2026/27 (paragraph 4.4, Housing Delivery Topic Paper). It is also worth pointing out that the Guildford Local Plan period will run on for a further 6 years beyond that date, and that additional housing provision will likely be required for this period as well. The Vision must include a commitment to meeting housing need in the housing market area, as required by the NPPF.

The Vision suffers from a failure to articulate the strategic priorities that the Local Plan must address. Furthermore, it fails to specify how these challenges may differ in different parts of the Borough, or how the Vision may respond to different needs within the borough. It is the case that the Thames Basin Heath SPA covers a large area across the northern part of the Borough, and the Surrey Hills AONB stretches across its southern parts. It is clearly appropriate for these to be afforded great protection. However, in relation to the latter, reference should be made to the forthcoming AONB Boundaries Review to be undertaken by Natural England. This will need to consider not only what other sites might merit AONB status, but also which sites might no longer warrant such status. This will ensure that it is the most valuable landscape that is afforded the strongest protection.

Test of Soundness

In view of the above considerations, we consider that the Local Plan Vision is not sound, because it is not ‘consistent with national policy, as it fails to address how the wider needs of the Housing Market Area (HMA) will be addressed. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability. The vision also needs to be amended to include reference to the future AONB Review.

Proposed Changes

The Spatial Vision needs to be amended by inserting a specific commitment to ensuring that the unmet housing needs across the wider West Surrey Housing Market Area will be properly met.

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

Attached documents:
The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.

- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable. Guildford already has a problem with congestion and air pollution.

- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

**Spatial Vision**

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its
infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.” [1]

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report1 also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.
The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3 km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km²) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km²) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

"The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car."

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the
plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate
forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.

Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific
development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.


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

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

I object to the 2016 draft local plan for the following reasons

I object to the overall strategy

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

I object to the proposal to remove Send and Ripley from the green belt

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

I object to the inclusion of the Garlick's Arch site

This proposal has been included at a very late stage and has not been consulted upon previously. It was not included in the Regulation 18 draft.

There are no exceptional circumstances to warrant the development, but there are such circumstances which make it unacceptable, such as its conservation sensitivity, being covered with ancient woodland, with trees dating back to the 16th century.

According to the Land Needs Assessment 2015 (ELNA) required employment space has reduced by 80% since the previous draft plan, so is no need for the proposed 7000 sq m of industrial development on this site. If there is eventually such need, it should be situated at Slyfield.

I object to the proposed new 4 way A3 junction

The proposed new junction could help parts of the area such as the centre of Ripley, but that benefit is entirely outweighed by the hitherto unimaginable volumes of traffic which would cause gridlock at Burnt Common roundabout as well as on the entire section of A247 from West Clandon to Woking. With these areas gridlocked, traffic would need to find alternative routes and the previously little known lanes around the area would be ruined also. This one singular act of folly would cause immeasurable damage to a wide area.

I support the development of Wisley Airfield

There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25.

Your consideration of the above points would be appreciated

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14239</th>
<th>Respondent: 8806849 / Roland McKinney</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

### Vision and Ambition

I object to the lack of vision and ambition in this plan.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but one that has not learned the lessons of the past.

There are many contradictions within this draft Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, this a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.

- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.

- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without this huge expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever.

- Similarly, much of the infrastructure required has to be built by private companies, such as Thames Water and Network Rail, companies over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that currently blights the lives of thousands of people, especially those who live close to proposed development areas, and if implemented will blight the lives of thousands more.

- GBC have assumed the delivery of all vital infrastructure, but this is unwise. No risk assessment has been done to assess the risk and effect of the non-delivery of vital infrastructure within the time frame of this plan. These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

### Spatial Vision
A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside, even where this is protected by its green belt status.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40μg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road, by cars and vans.

This report also suggested that:

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set
aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of electric and LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads
  "The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.
  If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the green belt. More than 6% of the Green Belt will lose that designation.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km²) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make an important contribution to the openness of the green belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km²) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are washed over by the green belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say:

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure
and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report 2 was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment of residents over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% higher in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report, an explanation of employment forecasts
were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

Guildford Borough Employment Land Assessment Report, AECOM, September 2015

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome. Averaging them is not a robust approach.

In addition, the emphasis on just these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up those unemployed as a consequence of business closures, as well as create new opportunities. Concentrating on just two employment categories weakens this report, and lessens the credibility of its conclusions. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to and including 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of total land area: land occupied by premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations,
Despite having recently published a study that examines investment needs on this route up to 2043, in this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.

Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.

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

Attached documents:
INFRASTRUCTURE Strategic Objective 2

The issue of leisure cyclists should be addressed. Since 2012 the vast numbers of cyclists renders average speeds to less than 15mph, esp at weekends. On most routes it is difficult to pass these due to insufficient forward visibility.

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

Attached documents:

Comment ID: pslp171/1096  Respondent: 8826177 / Charles Spence  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

1. The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation is welcomed but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt. The changes also mean that the eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.
2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other types of Council have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,426 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.
3. I cannot comment on legal compliance and duty to cooperate as these are technical requirements and it is not reasonable to expect a member of the public to comment on these items

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

Attached documents:

Comment ID: PSLPP16/411  Respondent: 8826241 / Charles Meade-King  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Please can you advise where and when the public occasions are for us to speak to representatives of the Council and discuss the proposed Local Plan. Three dates are mentioned but when are they and where are they?

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

Attached documents:

Comment ID: PSLPP16/17757  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I consider that the vision underlying this Local Plan is poor, inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford other than creating more low paid retail jobs for which truly affordable housing will not be provided under the Local Plan where even so called affordable houses would be well out of the reach financially resulting in even more commuting from outlying towns and villages and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.
- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.
- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.
- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

Spatial Vision

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries,
such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

• The opening text of the Spatial Vision reads
“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km2) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km2) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up
land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report[2] was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report2, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics
These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1.0.35 to 1.0.45 (ratio of land : premises) for manufacturing and from 1.0.40 to 1.0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1.0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1.0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).”

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.
Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.


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

Attached documents:

---

Comment ID: PSLPP16/8465  Respondent: 8893057 / Dianne Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

I would like to make the following comments:

Vision and Ambition:

I OBJECT to this plan as it is based on a requirement for 13,860 new built homes by 2033. it would appear that the figures on which this is based are faulty, how the numbers were arrived at and who was responsible should be completely transparent to the public who are affected, and they should come from a quarter who has nothing to gain from homebuilding themselves. It also appears that it assumes a population increase far greater than that seen over the last ten years. Guildford is within the Green Belt and access and roads around it are already often gridlocked, and it seems no proper plan has been made to deal with this. I also object on the grounds that the future of Britain's economy after Brexit is entirely unknown, and the population numbers due to people of other nationalities leaving or lack of immigration may leave us with swathes of Greenbelt built on needlessly. This huge number needs to be rethought and the Greenbelt needs to be respected.

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

Attached documents:

---

Comment ID: pslp171/87  Respondent: 8921793 / Graham Richings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Our vision and ambition (3.1 and Table Spatial vision)

I object to the added wording "at least" to the housing number of 12,426. This is open ended and could for instance lead to serious development in areas like the Hog's Back and other Green Belt Land. There should be a maximum number and not an open ended number. Bearing in mind that the new housing needs figure has now been changed at least three times casting doubt on how reliable the calculations and methodology that has been used is. I believe that the housing need figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concemcd about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future. GBC should make public how their housing need figures have been arrived at. We cannot comment in any meaningful way with out that information.

In the same area of the plan I am concerned at the housing number as amended. 13,860 have been reduced to 12,426. I am highly suspicious of these figures. This is the third time that these and other figures have changed. How were the calculations got so wrong in the first place? Physically nothing has changed. That being the case there was either human error (misjudgement ) or the wrong formula was used. Or it was some bargaining stance? How can we trust the current figures which seem far too high and when a lot of the reasoning seems to be done on wishful thinking. I think that I am right in saying that the Blackwell farm figure was near 3.000 originally and now well down from that! Unless GBC make it known to us all how the housing needs figures were arrived at we can have little faith in the housing need figures. There is clearly physical; room for 3,000 or more houses and the way things are the current above figure could be increased down the road.

In the same area of the Plan I can see no reason whatsoever to extent the Research Park onto Blackwell Farm. There seems to be a housing need although not proved. We do not need more commercial property on Green Belt Land. Houses?

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

I object to the added wording "at least" to the housing number of 12,426. This is open ended and could for instance lead to serious development in areas like the Hog's Back and other Green Belt Land. There should be a maximum number and not an open ended number. Bearing in mind that the new housing needs figure has now been changed at least three times casting doubt on how reliable the calculations and methodology that has been used is. I believe that the housing need figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concemcd about future consequences.

Attached documents:
figures are far too high. We need to know how they have been arrived at. It appears that GBC do not have or know what these calculations are. This shows a serious lack of leadership and incompetence. They flatly refuse to tell the public how the house needs figures have been arrived at. It also possible and likely that the National Audit Office figures on which some of the calculations were based was wrong. This is just another case of senior people in the Council not listening to local tax payers and not being concerned about future consequences. Look at what happened in respect of Grenfell Tower. They did not listen to concerns. Similarly we could see a disaster occurring to our Green Belt and countryside in the future. **GBC should make public how their housing need figures have been arrived at. We cannot comment in any meaningful way without that information.**

In the same area of the plan I am concerned at the housing numbers as amended. 13,860 have been reduced to 12,426. I am highly suspicious of these figures. This is the third time that these and other figures have changed. How were the calculations got so wrong in the first place? Physically nothing has changed. That being the case there was either human error (misjudgement) or the wrong formula was used. Or it was some bargaining stance? How can we trust the current figures which seem far too high and when a lot of the reasoning seems to be done on wishful thinking. I think that I am right in saying that the Blackwell Farm figure was near 3,000 originally and now well down from that! Unless GBC make it known to us all how the housing needs figures were arrived at we can have little faith in the housing need figures. There is clearly physically room for 3,000 or more houses and the way things are the current above figure could be increased down the road.

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

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

Page 21, Spatial Vision

and be: and will be

Objection

12,426 additional homes by 2034 would be too many. The target is unrealistic. You could say up to 400. per year.

Objection to building on the Green Belt (with very few small scale exceptions).

Objection to development and loss of Green Belt at Blackwell Farm. There will be too much development on land taken from the Green Belt.

Page 22

Objection to proposed further development in and around Ash and Tongham on land beyond the Green Belt. The number of new homes and the density of the development will be too high.

locate: located

Page 23

deliver: provide

In this sentence you are going to deliver road safety and congestion relief will be delivered. It looks as if you are running vans delivering items.

3.2

Objection – add the following:

Pollution and air quality

3.3

We have included 'air quality' to the list of issues in respect of the environment because poor air quality is a danger for many people, especially for children and elderly people. The local plan has the potential to limit or improve poor air quality by the implementation of many policies. Meeting various needs or demand for homes in the Borough will mean more roads to service homes, more vehicles and more air pollution. Poor air quality is already causing illness and death, especially in the south east. Data from Public Heath England indicate that 5.3% of all deaths every year in people over 25 are linked to air pollution. It is especially bad for children because their lungs are still developing. We will monitor air quality and take action (eg near schools) to limit air pollution as funds allow.

Note: The Guildford Borough Local Plan should contain data showing existing and future air pollution levels in various places in the Borough (eg in Ash and Guildford), just as it contains facts and figures for many other subjects. Data should not be in supporting documents only.

Parking

We have also included off-street parking as a lack of this often causes numerous problems for road users, pedestrians and residents.
Objection to the following not being specifically mentioned on pages 24-26:

air quality, cycle routes, off-street parking for cyclists and drivers.

Please see my earlier letters. Unfortunately, the amount of additional development planned by Guildford Borough Council will add to air pollution, disadvantage cyclists on existing roads and cause more parking problems.

Page 24 Environment Issue

Add improving air quality, eg near schools.

Page 24 Society Issue

traveler: traveller

Page 26 Infrastructure

public transport: public transport and cycle routes

In spite of the benefits of cycle routes, you have not specifically included them here, even though they may sometimes be forgotten by planners and engineers or may not be given much priority.

Add, as an issue: Lack of adequate, secure, well designed off-street parking for cars and cycles.

Your plans for increased development will increase the need for such parking, eg (a) on the south east side of Church Road A323, north of the railway, Ash, and (b) probably on the south west side of Effingham Common Road, south east of the railway at Effingham junction (alternative common land may have to be found to 'compensate').

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

Page 21, Spatial Vision

and be: and will be

Page 22

located: located

Page 23

deliver: provide

In this sentence you are going to deliver road safety and congestion relief will be delivered. It looks as if you are running vans delivering items.

3.2

Objection – add the following:

Pollution and air quality
We have included 'air quality' to the list of issues in respect of the environment because poor air quality is a danger for many people, especially for children and elderly people. The local plan has the potential to limit or improve poor air quality by the implementation of many policies. Meeting various needs or demand for homes in the Borough will mean more roads to service homes, more vehicles and more air pollution. Poor air quality is already causing illness and death, especially in the south east. Data from Public Heath England indicate that 5.3% of all deaths every year in people over 25 are linked to air pollution. It is especially bad for children because their lungs are still developing. We will monitor air quality and take action (eg near schools) to limit air pollution as funds allow.

Note: The Guildford Borough Local Plan should contain data showing existing and future air pollution levels in various places in the Borough (eg in Ash and Guildford), just as it contains facts and figures for many other subjects. Data should not be in supporting documents only.

Parking

We have also included off-street parking as a lack of this often causes numerous problems for road users, pedestrians and residents.

Page 24 Environment Issue

Add improving air quality, eg near schools.

Page 24 Society Issue

traveler: traveller

Page 26 Infrastructure

public transport: public transport and cycle routes

In spite of the benefits of cycle routes, you have not specifically included them here, even though they may sometimes be forgotten by planners and engineers or may not be given much priority.

Add, as an issue: Lack of adequate, secure, well designed off-street parking for cars and cycles.

Your plans for increased development will increase the need for such parking, eg (a) on the south east side of Church Road A323, north of the railway, Ash, and (b) probably on the south west side of Effingham Common Road, south east of the railway at Effingham junction (alternative common land may have to be found to 'compensate').

Attached documents:

Comment ID: PSLPP16/18639  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

3.0 SECTION 3: VISION AND AMBITION

3.1 We broadly support the vision set out in the Local Plan but consider that Guildford Town should be identified as the focus for future development and infrastructure provision, acknowledging the benefits which will result.
3.2 On behalf of our client, we challenge the statement made at the end of the Vision which indicates that housing
delivery in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford. We
discuss this matter in more detail below and in response to Policy A25 for Gosden Hill.

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

Attached documents:

Comment ID: PSLPP16/17226  Respondent: 8944929 / A Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

I object to the fact that this proposed plan does not meet the needs of local communities.

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

Attached documents:

Comment ID: PSLPP16/17293  Respondent: 8967233 / University of Surrey (University of Surrey)  Agent: Terence O'Rourke (Luke Vallins)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Our vision and ambition, paragraph 3.2

The University broadly supports the Spatial Vision as set out in the box in paragraph 3.2, but has the following comments
on specific aspects.

Paragraph 4 of the box

Paragraph 4 of this box refers to the plan making provision for the following development:

• Just under 4,000 units on two urban extensions at Gosden Hill Farm and Blackwell Farm.
• A new settlement at Wisley containing over 2,000 homes
• Significant expansion at Normandy and Flexford to provide over 1,000 homes
• Further development in and around Ash and Tongham

Detailed comments on these allocations are provided in response to the relevant policies later in these representations.
Whilst the University broadly supports the provision of large strategic greenfield sites as an essential part of the
development strategy Blackwell Farm in particular is strongly supported. It is well placed to provide for a significant
element of the borough’s needs, being located next to the significant employment areas located in the western part of
Guildford town (including the Surrey Research Park, the Royal Surrey County Hospital, and the University of Surrey).
However, the proposed ‘new settlement’ at Wisley and the extension to Normandy and Flexford in particular are less well
placed, being relatively remote from existing urban areas.

Paragraph 6 of the box
The University is supportive of the message set out in paragraph 6 of this box, which explains that existing commercial premises will be protected and that additional sites and premises will be provided to meet the needs of businesses across the borough.

The box also explains that the primary new site proposed to meet the needs of businesses across the borough is an extension of the Surrey Research Park. The University is pleased to see that the borough recognises the importance of the Surrey Research Park, and fully supports its extension to cater for the growing needs of businesses for employment space in the borough.

The University considers it has a major role to play in assisting the achievement of the Council’s Spatial Vision, both in its position as a centre of academic excellence and research and development and its links with the Surrey Research Park, the Royal Surrey Hospitals Trust and the Pirbright Institute, and as the custodian and developer of a strategic development site delivering a high quality mixed use and inclusive community at Blackwell Farm.

Specifically:

• The University’s development, whether on its campus or at the strategic development site allocation (Policy A26) at Blackwell Farm, will ensure that supporting infrastructure needs are included. The University has a strong track record in providing infrastructure to support its activities, including funding improvements on the local road network (junction improvements) and sustainable movement (cycle ways and bus services)
• The University is a world class higher education and research institution and its activities have led to the establishment and growth of several world class businesses in Guildford
• Through the allocation of its land at Blackwell Farm as a strategic development site, and the future growth of the Surrey Research Park, the local plan will assist the University in cementing its position and securing its future in Guildford
• The University has provided many buildings of excellent design on its campus, and is planning a new community at Blackwell Farm that will be guided by a strong design code to ensure quality
• The University’s proposals at Blackwell Farm will provide a range of new homes to support the Council’s ambition to have new homes to meet a range of needs
• The University has heavily subsidised public transport to create a frequent and reliable bus service linking the Surrey Research Park and the University campus to the town centre and beyond. The University has also invested in providing new and improved cycling and pedestrian routes in the western part of town
• Proosals for a new community at Blackwell Farm will link into this existing favourable framework
• The University’s contribution to the life and culture of the town is significant through its wide range of activities and facilities, including sports and arts facilities that enrich the wider community of Guildford
• The University’s proposals for Blackwell Farm will respect the natural, built and heritage environment

Paragraph 12 of the box

• The University agrees that there should be improvements to the A3 and M25 to enhance access into Guildford and reduce congestion levels. It is therefore encouraging that improvements are included within the Department for Transport’s Road Investment Strategy, and the University welcomes such improvements provided they are effective and are delivered in a timely manner.
• However, the University is concerned about the view that the delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford, and considers that this has not yet been robustly demonstrated.
• The Strategic Highway Assessment (SHA) Report (SCC, June 2016) comes to this conclusion, but recognises that its approach represents a “worst case” in terms of highway demand that has not taken into account any reduction in trips generated because of the mixed use nature of large developments or proposed investment in sustainable transport modes and other mitigation measures. Detailed comments in relation to the SHA are provided separately.
• The Local Plan should reflect the fact that highway infrastructure requirements set out are based on a ‘worst case’ assessment of highway impacts and that there must be flexibility in delivery. This should be reflected in the Local Plan Vision and in Policy I1 and Appendix C.
• Nevertheless, the University recognises that further, more detailed assessment work will be required ahead of examination, such as identifying at what point widening of the A3 is triggered and what development can come
forward ahead of this. In this regard, it will endeavour to provide technical assistance to GBC, SCC and Highways England wherever possible.

- The University considers that some of the housing at Blackwell Farm can and should come forward in advance of the improvement to the A3 through Guildford, given its position on the network. This will be particularly important if funding arrangements for the A3 improvements are delayed for any reason.
- The proposed new access from the A31 to serve the site will also provide an alternative means of access to and from existing employment areas at the Surrey Research Park, Royal Surrey County Hospital and the University of Surrey, taking some traffic away from the A3. Therefore provision of the access from the A31 through Blackwell Farm to the Surrey Research Park might be an early project to assist the A3, and a proportion of development at Blackwell Farm should come along with this.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18649</th>
<th>Respondent: 9079393 / Wisley Property Investments Ltd.</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

**Changes Sought**

The Vision should refer to ‘at least’ 13,860 dwellings.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2746</th>
<th>Respondent: 9079393 / Wisley Property Investments Ltd.</th>
<th>Agent: Savills (Jim Beavan)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Policy/ Section / page / para</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spatial Vision Page 19</td>
<td>The draft Vision should refer to ‘at least’ 13,860 dwellings.</td>
<td>(Page 21 and 22) An “at least” requirement has been added. However, the housing requirement has reduced to 12,426 by 2034 from 13,860 by 2033.</td>
<td>Welcome change to the reference to ‘at least’ and also ‘approximately’. No further comment on overall housing provision.</td>
</tr>
</tbody>
</table>
Changes are also made to composition of housing, for example, requirements from urban areas have changed from “over 2,800” to “approximately 3,000” units.

The housing requirements from Wisley New Settlement have also changed from “over 2000 homes” to “approximately 2000 homes”.

All other objections withdrawn.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/318</th>
<th>Respondent: 10747137 / Brenda Brooks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

I am writing to protest most strongly against this new Plan.
I am 88 years old and have lived most happily for the last 48 years in East Lane but I hope I die before I have to live in the middle of this. This proposed housing development is a nightmare.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17515</th>
<th>Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

We consider that the vision underlying this Local Plan is inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people
who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.
- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.
- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.
- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

**Spatial Vision**

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.
Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.” [1]

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report[1] also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:

- The opening text of the Spatial Vision reads

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to
Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

- Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km²) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

- Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km²) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car. ”

Or, to put it another way: **11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.**

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.
The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report[2] was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report2, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within
Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.

Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.
I've lived in Guildford all my life and I cannot help but point out that the section on infrastructure is fatally flawed. As a person currently trying to become qualified as an environmental consultant I appreciate the need to protect the environment and provide sustainable forms of transport, but there is a need to recognise that Guildford's economy at present has a heavy reliance on the car as the primary means of transport and that isn't going to change in the short-term - thinking otherwise is delusional. Guildford therefore needs good road access, but there has been historically a real lack of nerve to make the decisions that really needed to be made for the sake of the prosperity and development of the town, and what worries my is that there doesn't seem to be much a move to correct this. There really should be a proper short-term of long-term internal road development plan devised. Amongst other things, the town desperately needs the ring road that should have been built in the 1960's instead of creating the town centre gyratory system and Millbrook, thereby routing all through-traffic through the centre of the town. That planning decision is now coming back to haunt us in the form of excessive traffic congestion through the town centre at peak times. The good thing is, it is not too late - there is still room to build a ring road within the Guildford Borough boundary and it could easily be justified as it would provide a means of developing the town in a more planned, coherent manner, and a vital main transport link along which further developments around the edge of the town could be placed. However, I'm not going to hold my breath for this, because like most people living in the town I know that unless the council gets to grips with this, it simply won't happen, which is bad for the people who live here in Guildford and bad for the Guildford economy. I appreciate that the idea of a ring road won't satisfy everyone, but it is what Guildford has needed for over 50 years and needs now more than ever. Naturally it will upset some people - particularly large landowners (as it did in the 1960's - which is why the ring road didn't get built back then) and some environmental campaigners who can't appreciate it that Guildford may exist in an AONB, but people still have to be able to live here and get around easily, and sometimes that means by road, but the vast majority of people will be glad to have a better way to get from one side of Guildford to the other, when they don't need or particularly want to have to go through the town centre.

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

Attached documents:
subject to a rethink. The objections included air quality as well as traffic and failure to cater for adequate infrastructure, including transport and schools. It is, however, presented as a fait accompli herein.

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

Attached documents:
Spatial Vision - OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Whilst Bewley is supportive of some elements of the spatial vision such as the proposal deliver 13,860 dwellings over the plan period, which meets exactly with its OAN, there are a number of fundamental issues in terms of the delivery of that requirement in the spatial development strategy that the Council is seeking to pursue.

As a consequence, and for the reasons set out in more detail in the representations below, the Plan has not been positively prepared, is not justified by the evidence base and fails to be consistent with National Policy.

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

Attached documents:

In defining a Spatial Vision for Guildford, in particular how best to meet housing need, regard should be given to the February 2017 Housing White Paper. The advice given to local authorities in the White Paper states that:

"... the Government asks local authorities to be as ambitious and innovative as possible to get homes built in their area. All local authorities should develop an up-to-date plan with their communities that meets their housing requirement (or, if that is not possible, to work with neighbouring authorities to ensure it is met), decide applications for development promptly and ensure the homes they have planned for are built out on time. It is crucial that local authorities hold up their end of the bargain. Where they are not making sufficient progress on producing or reviewing their plans, the Government will intervene. And where the number of homes being built is below expectations, the new housing delivery test will ensure that action is taken.” (Executive Summary) (our emphasis)

It is evident therefore that local authorities should be "ambitious" in making a contribution to the need to increase housing delivery. However, the White Paper also recognises that local authorities should maintain "existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements" but at the same time "making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land.” (Step 1: List of Proposals)

Although the draft Spatial Vision confirms that the preferred location for new residential is on existing brownfield sites we note that only 3,000 dwellings (previously 2,800 dwellings in the 2016 PSLP) of the total 12,426 dwellings (previously 13,860 dwellings in the 2016 PSLP) required over the plan period up to 2034 are in the urban areas. This means that despite this stated objective 76% of the new residential is allocated outside of the urban areas. The significant majority of proposed housing in Guildford will therefore not be able to take advantage of the existing infrastructure and services that are provided in urban area or help to reduce the need to travel and offer alternative modes of transport to the private car.
This remains inconsistent with the emphasis placed on encouraging the effective use of brownfield land contained in the NPPF (paras 17 and 111) and the encouragement given “to ‘boost significantly” the delivery of housing (para 47).

We consider that significantly greater emphasis needs to be incorporated in the Vision to reflect the Government's national policy imperative contained in the Housing White Paper as identified above. Whilst recognising the challenge of accommodating significant levels of housing within Guildford we would suggest that, as a matter of principle, the Vision should strongly encourage opportunities to maximise residential development within the Town Centre. This will help to ensure that the need to take 'greenfield' or Green Belt land is minimised.

We would suggest that this approach would more accurately and appropriately reflect Government green belt policy, which at paragraph 84 of the NPPF indicates that:

"When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the "preferred location". We would therefore suggest, to ensure consistency with national policy and plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:

"The plan provides for the delivery of 12,426 additional homes by 2034. As the preferred location for this development is on existing brownfield sites in the urban areas, in particular highly accessible locations within Guildford town centre, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 3,000 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car ...... “

In addition given the importance of the Guildford Railway Station within the town centre in terms of being a strategic development site which will improve station facilities, provide a new urban quarter and deliver a significant level of housing we would suggest that specific reference should be made to this site within the Spatial Vision text.

An additional sentence should be added to the text of the Spatial Vision after the paragraph that also deals with the North Street site to read:

"The redevelopment of the Guildford Railway Station site will deliver significant station improvements and assist in increasing station capacity, whilst making a major contribution to meeting housing need on a brownfield site in a highly sustainable location within the town centre.”

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

Attached documents:
Mill, Clandon House and Garden, Hatchlands and land at Netley Park, Little Kingswood and Hackhurst Down. These properties are of significant historic, economic, social, environmental, and amenity value.

The National Trust has a statutory obligation to ‘permanently protect places of natural beauty or historic interest for the benefit of the nation’. Therefore, any proposals which affect or could affect the River Wey and Godalming Navigations, Shalford Mill, Clandon House and Garden, Hatchlands and land at Netley Park, Little Kingswood and Hackhurst Down will need to have regard to these statutory obligations.

The National Trust has championed a strong, effective land use planning system in England since the 1920s. We strongly believe that planning exists to serve the public’s present and future interests. A robust system is the best way to guide good development to the right place and to ensure that poorly designed proposals and those in the wrong location don’t get built. We believe that good planning is an essential tool for balancing a variety of land use interests in the pursuit of an overriding public one and for ensuring sustainable futures for the nation’s special places.

**VISION**

Overall we support the Vision for the future of the borough, however, we consider that the Vision should place greater emphasis on building on, and protecting, the historic, cultural and environmental assets that make Guildford special. Whilst mention is made to the need for all new development in the town centre to respect and enhance the unique setting and historical character of the town, no mention is given to the wider historical assets in the borough, which together with other environmental assets are in large part, the foundation of its success. There is great potential to enhance these assets, not only for the amenity, environmental and cultural benefits this would provide, but also for the economic and social benefits that this would bring. The plan does indicate in some of the strategic objectives that the Borough now intends to take such an approach to protect and enhance heritage assets and designated areas, as well as improve the quality of the built and natural environment and we welcome this, but the intent is not always followed through in terms of detail and, for example, site allocations and proposed settlement boundaries. We believe that protecting and enhancing the environmental, historic and cultural assets of the Borough should be made explicit as a fundamental part of the Vision statement, not just within the Strategic Objectives.

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

I object strongly to to the Draft Local Plan for the following reasons: 1. I object to all erosion of the Green Belt 2. I object to any “in setting” (i.e. removal) of any villages from the Green Belt 3. I object to the disproportionate amount of development in one area of the borough 4. I object to the limited consultation period 5. I object to the last minute inclusion of new sites with less than two weeks notice 6. I object to the lack of any evidence for the alleged housing need numbers 7. I object to the lack of immediate provision for new schools 8. I object to the lack of any immediate provision for Doctors Surgeries 9. I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch on Ripley / Send border and Gosden Hill Farm as development of these sites would have a disproportionate impact on the surrounding villages 10. I object to the A3 road from the M25 to Guildford becoming so congested that it will become a serious health hazard as a result of exhaust fumes from stationary or very slow moving vehicles Please acknowledge safe receipt of this email.

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

**Attached documents:**
**Comment ID:** PSLPP16/382  **Respondent:** 15136641 / Jason Dack  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

As a Ripley resident, I am writing to express my objection to the development proposals outlined in the Draft Local Plan. Below are the objections I wish to make: 1. Destruction of the Green Belt I object to the proposals to remove (or “inset”) Ripley, Send and Clandon from the Green Belt. It is vital to preserve areas of outstanding natural beauty. Further developments will erode this and destroy the countryside. 2. Overdevelopment I object to the further housing and industrial developments in and around Ripley. There are a number of reasons for this - impact on local public services and infrastructure (see number 3), congestion (see number 4) and air quality (see number 5). 3. Overburdened infrastructure including added strain on local healthcare, education and police services I object to the lack of planning regarding infrastructure. For example, Garlicks Arch (Ripley/Send border). Without improvements to the infrastructure prior to any development, the quality of life for current residents will deteriorate significantly and in many ways. Existing doctor’s surgeries and schools are already stretched or at capacity. Services such as the Villages Medical Centre in Send will have their services overwhelmed. Many public services (for example, the police) are suffering from funding cuts or freezes. I object to the proposals due to the further burden it will put upon existing services. 4. Congestion on the motorways, roads and lanes I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. The developments will worsen the situation on the motorways, roads and lanes. Furthermore, Highways England has no plans to look at improving the A3 for a number of years. My village (Ripley) is already suffering from severe congestion for much of the day. For example, the top of Newark Lane leading to the high street is a bottleneck. It is very narrow and has an enormous amount of traffic attempting to get through – I live there and see it for myself every day. As well as being highly congested, there are numerous incidents of road rage. Many of the country lanes around the villages of Ripley, Send and Clandon are very narrow and wide enough for only one vehicle at a time. Road surfaces in general are in a poor condition and heavy traffic will make them worse. I object to further development as it will mean more traffic, more congestion, more frustration, more noise and more pollution. 5. Poor air quality I object to detrimental effect these developments will have on air quality. Further heavy traffic, particularly in built up residential areas, will only lead to greater levels of air pollution. 6. Parking I object to the new developments because parking is already a huge problem in Ripley. My partner and I do not even have a parking space. I can only imagine how much worse the situation will get with a larger population. 7. Disproportionate size of sites I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent detrimental impact on each of these communities. 8. Unbalanced allocation of development in one area of the Borough Between the M25 and Burpham (a distance of only approx 5 miles) it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough. 9. Capacity of utilities I object to the undoubted added burden on many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks. 10. Sites being planned in unsustainable locations I object to the location of these developments because many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable. 11. Lack of proper pedestrian footpaths on local roads I object to these developments as footpaths in Ripley are already narrow and in some places non-existent. A further substantial increase in the local population will make navigating these footpaths more hazardous. 12. Heritage I object to the effect these developments will have on the area’s heritage. There are a number of heritage sites in the region and no account is being taken on the impact of these points of historic interest.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/3591  **Respondent:** 15245313 / C.A. Lindsay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have the following objections to the new Local Plan:

3) Our vision and ambition, Spatial Vision on p19 I strongly object to this statement. The language used is highly, highly positive, but the message is negative for Guildford. I do not believe that any of this is proven fact.

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

Attached documents:

Comment ID: PSLPP16/2164  Respondent: 15270273 / Hart District Council  Agent: David Hawkes

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

Thank you for consulting Hart District Council on Guildford Borough Council’s Proposed Submission Local Plan: Strategy and Sites. Hart would like to make the following comments on the approach to housing numbers and the duty to cooperate.

Guildford is in a housing market area (HMA) with Woking and Waverley. Hart is within an adjoining HMA comprising Hart, Rushmoor and Surrey Heath.

Under the NPPF the start point is that the objectively assessed housing need (OAHN) for each HMA should be met within each HMA. Our understanding of the situation in the Guildford/ Waverley/ Woking HMA is as follows:

- Guildford Borough Council has published a Regulation 19 Local Plan that meets its objectively assessed housing need (OAHN).
- Waverley Borough Council is due to publish a Local Plan (Part 1) in August 2016. The version that goes to Council on 19th July 2016 would meet their OAHN.
- Woking Borough Council appears to be planning for a housing target that is below its OAHN. At present they are preparing a Site Allocations document that will deliver the housing target in their adopted Core Strategy. This will plan for 292 dwellings per annum between 2010-2027, whereas their OAHN is 517 per annum (2013-33). The Site Allocations DPD is due for a Regulation 19 consultation in September 2016, with submission in April 2017. There is nothing in Woking’s published Local Development Scheme that suggests a new local plan will be prepared to address the full OAHN in Woking.

There is therefore at present some uncertainty as to how the full OAHN for the whole HMA will be met. This uncertainty is caused not only by Woking’s position, but also because Waverley’s Plan could, in theory, be found unsound and their housing strategy could be subject to change.

It is noted that a Memorandum of Understanding is to be prepared between the three authorities with the aim that OAHN is met across the HMA. However it is unclear how this will guarantee that every effort is made to address OAHN in full.

Hart District Council therefore suggests that some flexibility is needed in the Guildford Plan to address this uncertainty and ensure that OAHN across the HMA is met. This flexibility could be in the form of a Review Clause inserted into the Plan which would be triggered in the event that between them, Woking and Waverley do not address their OAHNs in full.

We anticipate making a similar representation to Waverley Borough Council assuming they publish their Regulation 19 Plan meeting only their housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2374</th>
<th>Respondent: 15279649 / Martin Stringfellow</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no comment on how the increased demand for non-transport related infrastructure in the Horsleys resulting from the massive number of new houses will be met. In particular, how can the increased demand for medical facilities be met?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7462</th>
<th>Respondent: 15448897 / Ruth Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The local plan seeks alignment with the council’s corporate plan 2015-20 which establishes the ambition for Guildford to be ‘a town and rural borough that is the most desirable place to live, work and visit in South East England.’ It goes on to say that ‘we want Guildford to be a centre for education, healthcare innovative and cutting edge businesses, high quality retail and wellbeing…’ <strong>This plan does not seek to fulfill the above intentions</strong> as it aims to provide low cost housing and industrial units (supporting a town which has rejected high quality retail development in favour of low status anchor tenancy for shopping centres in the future – to the dismay of many residents and council tax payers).</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9786</th>
<th>Respondent: 15486017 / Neil Higgins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• I object to a “Vision” which will create an urban sprawl from Guildford up to the M25. The Green belt is there for a reason – The clue is in the name</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18686</th>
<th>Respondent: 15619201 / Michael Conoley Associates (James Deverill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
</tbody>
</table>

---

Page 55 of 65

Document page number 93
Spatial Vision
The plan provides for the delivery of 13,860 additional homes by 2033. Considerable effort has been undertaken by the Council to understand the borough’s housing needs through the Land Availability Assessment (LAA) and Strategic Housing Market Assessment (SHMA) and, for the purposes of this representation, we do not seek to challenge the Council’s conclusions in this regard.

We agree that the preferred location for this development should be existing brownfield sites however; only 2,800 units are proposed by the plan for the urban areas which take advantage of the existing infrastructure and services. The plan notes the benefit of these sites is that they reduce the need to travel and offer alternative modes of transport to the private car. Significant expansion is also planned to the Guildford Urban Area and around Ash and Tongham which takes advantage of the existing infrastructure and services.

Much of the remaining provision is in a new settlement at Wisley (2,000 homes) and a significant expansion at Normandy and Flexford which will provide over 1,000 homes. As noted within the plan, the delivery of some of these major sites is dependent upon major improvements to the M25/A3 interchange and the A3 around Guildford and therefore the houses will not be able to be delivered until the later years of the plan. Some of the larger sites may not be deliverable within the plan period at all should agreement not be received from the Department of Transport for the infrastructure improvements. Therefore, it appears the delivery of the required 13,860 additional homes may not be achieved by this plan.

The plan also proposes almost 1,200 dwellings on non-strategic sites within and around existing villages and over 750 dwellings as extensions to existing villages. We agree that this is important because it will help offer a variety of housing in villages and help contribute to maintaining and improving local services and village life. When Michael Conoley Associates have organised Public Consultations for small residential developments in villages in the borough, the overwhelming feedback from residents is their support for schemes which will improve the facilities and services in their village and provide lower cost housing that their children may be able to afford and allow them to continue to live locally.

A number of smaller more sustainable sites on the edges of villages have been identified in the past by the LAA and the Green Belt and Countryside Study but omitted from the Proposed Submission Local Plan, the Council apparently having concluded that the provision of the larger sites will limit the impact of new development to a few pockets within the borough. Given the majority of the proposed housing will only be deliverable towards the later years of the plan period (if ever) we consider that additional smaller allocated sites should be included within the document to meet the supply requirements for the shorter term (first five years in particular). As discussed in 2.2 it would make sense that the small sites which are promoted are those that are located in villages which benefit from existing facilities and offer alternative modes of transport to the private car to lessen the impact on the overstretched road network in Guildford. As an example, both Normandy/Flexford and Ash/Tongham benefit from railway stations with regular and direct access to Guildford on the North Downs Line. This will improve following the addition of the proposed station at the Surrey Research Park.

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

Attached documents:

Comment ID: PSLPP16/15988  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

Guildford borough Proposed Submission Local Plan: strategy and sites June 2016
Thank you for consulting Surrey County Council on the Guildford borough Proposed Submission Local Plan: strategy and sites document. This is an officer response that has been agreed with the Cabinet Member for Environment and Planning.

The county council is committed to ensuring Surrey’s economy remains strong and to maintaining a high quality of life and well being for Surrey residents through economic development and planned growth underpinned by the timely delivery of supporting infrastructure. This is reflected in current partnership working with boroughs and districts through ‘Surrey Future’ and on the recent Surrey Infrastructure Study, which aim to help support the delivery of agreed local plan and economic strategy priorities. The vision and strategy outlined by Guildford Borough Council in its Local Plan is considered to be broadly consistent with this policy position. The Plan sets out the needs of the borough’s residents and the county council acknowledges that balancing the need for housing and employment growth and the need to protect the Green Belt is a matter to be decided locally through the Local Plan.

A key issue for the county council is the implications of the Proposed Submission Local Plan’s policies and proposals for infrastructure, for which the council is the provider, especially education, transport and waste management.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/15993  **Respondent:** 15629025 / Surrey County Council (Sir or madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

3. Our Vision and ambition Page 18

To be consistent with the core themes of the plan the sixth paragraph of the vision should be changed to ‘Existing high levels of economic prosperity will be maintained, supported and enhanced through the protection of commercial premises and the provision of additional sites and premises ...’ This would be consistent with strategic objective 8 on page 23 ‘To maintain and enhance our role as one of the County’s key employment locations in both a strategic and local context ..’ and the economy policies (section 4.4) which set out policies for a more flexible approach to the change of use of locations outside town centre and key existing employment locations to ensure existing and future economic demand is accommodated.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/18625  **Respondent:** 15661921 / Natural England (Marc Turner)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

On page 22 of this document, there are a list of Core Themes which run through the completion of this Local Plan. Natural England are generally supportive of this list, however we have one minor suggestion to make. With regard the “Environment” theme, Natural England would the ambition also has the word maintain added to it. As discussed above it is very important to conserve and enhance biodiversity, but it is equally important in some cases to maintain and preserve what is already present on the site.

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

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17244</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the lack of consideration of parking issues in local villages caused by larger population</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2285</th>
<th>Respondent: 15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 GUILDFORD LOCAL PLAN</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.1 Vision and Objectives</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.1.1 Gladman are concerned that the vision outlined in the previous Local Plan has been significantly watered down by a general reduction in development levels across the area. As expressed in other areas of this representation we do not consider these changes can be justified by evidence. It is our concern therefore that the vision from the plan is fundamentally flawed and is not justified, effective, positively prepared or in accordance with national policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17670</th>
<th>Respondent: 15693153 / Zurich Assurance Ltd (Sinéad Morrissey)</th>
<th>Agent: Barton Willmore LLP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>REPRESENTATIONS TO GBC’S VISION AND AMBITION</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GBC set out at Section 3 of the Proposed Submission GBLP, the Vision and Ambition for Guildford Borough. The key points can be summarised as follows:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Meet the identified growth needs of the borough in terms of housing, employment, retail and leisure;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Provide the delivery of 13,860 additional homes, in a range of sizes and preferably on brownfield sites, by 2033 to reflect local needs and create mixed communities;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Affordable housing will account for approximately 40% of all new housing and provided on all appropriate sites;</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
• Maintain the extent and function of the Green Belt so to protect the existing character of the borough and a clear distinction between urban and rural areas as well as the natural, built and historic environment;
• Over 2,800 units are proposed in the urban areas and will take advantage of existing infrastructure and services as well as sustainable transport options;
• Due to it not being possible to meet all the borough’s development needs within Guildford’s urban areas, the plan proposes to deliver additional housing on sustainable locations within and around existing villages and as large strategic extensions to Guildford’s urban area and as a new settlement created at Wisley that will bring forward significant infrastructure;
• Provide a significant increase in accessible public open space across the borough;
• Maintain and support existing high levels of economic prosperity through the protection of commercial premises and the provision of additional sites to meet the needs of businesses across the borough;
• Support the rural economy;
• Maintain and enhance Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey; and
• The growth proposed is predicated on the delivery of the necessary improvements to infrastructure, including new rail stations, park and ride facilities and major improvements to the A3 and A3/M25 interchange, as outlined in the Infrastructure Schedule that supports the plan as well as encourage the use of alternative modes of transport.

Zurich supports the objectives of GBC, coming forward within their Vision and Ambition, particularly where this seeks to provide new homes to meet the needs of its communities.

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

Attached documents:  

BBP-1 Reg 19 Reps.pdf (1.1 MB)
While this discusses encouraging visitors to use alternative modes of transport and having policies that reduce car traffic it must come out and say we need to **create an integrated safe cycle network** throughout the town which in turn connects to all parts of Guildford and on to neighbouring towns such as Woking, Leatherhead, Godalming and Farnham. The return on investment for the town by spending money on improving cycling infrastructure will be at least tenfold.

The vision for Guildford must follow London’s example and wake up to the health, pollution and congestion solutions that cycling can achieve. Build it and we will ride it!

**Core Theme – INFRASTRUCTURE**

This has a strategic objective to deliver a safe transport system balanced in favour of sustainable transport modes! Let’s talk CYCLING and WALKING, not Sustainable Transport modes please.

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

Attached documents:

---

**Comment ID:** PSLPP16/18706  **Recipient:** 15733665 / Vortal Properties Ltd  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

**REPRESENTATIONS BY VORTAL PROPERTIES LTD ON THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN STRATEGY AND SITES; JUNE 2016.**

**Introduction**

ShrimplinBrown Ltd are instructed by Vortal Properties Ltd (our client) to submit the following representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document, June 2016.

ShrimplinBrown have undertaken a comprehensive review of the Draft Guildford Local Plan document as well as the relevant supporting evidence base. In accordance with the guidance set out within the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012, the following representations relate specifically to the “legal compliance” and “soundness” of the draft Local Plan. As well as the specific tests of soundness set out in the NPPF.

These representations relate specifically to our clients’ interest in the development of Site Allocation A28 – Land to the east of White Lane, Ash Green. Specific comments and clarification on the site are set out at the end of these representations.

For ease of reference we have set out our clients’ representations within this single document which addresses the relevant questions set out within the questionnaire and makes clear references to specific; paragraphs, policies and site allocations within the draft plan.

**Key Diagram and Proposals Map (Paragraph 1.15)**

Whilst the Key Diagram is diagrammatic the maps included in the Appendix serve to identify the boundaries of sites for development as well as amendments to the boundary of villages. Accordingly, these should be set with clear boundaries as part of the identification of Sites.

It is recommended that for clarity that the Final Proposals Map is shown at a higher resolution.
The inclusion of Site A28 within the extended Ash Urban area is supported. The inclusion of the site within the urban area will also be important in ensuring the viability of the proposal.

In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see accompanying plan) and set within the defined Ash Urban Area on the Proposals Map.

Spatial Vision

With regard to the reference at Paragraph 3.2: the Corporate Plan only covers a short timeframe 2015-2020 and is principally a mechanism for stimulating short term actions; for example the adoption of the New Local Plan.

Our client considers that the Plan Vision should not be dictated by one source. As the Plan evolves so should the Plan Vision in order to reflect the updating of Evidence Base work and input from consultation responses. Our client has concerns that the Vision does not currently fully reflect the realities of the spatial approach which is by necessity focused on both the release of large significant greenfield sites as well as development within and surrounding towns and villages.

Whilst the release of existing brownfield sites (which may be within either urban or rural locations) may be preferable, the realities of delivering the necessary growth in Guildford Borough is that significant greenfield releases are essential. Also with the current significant deficiencies in the provision of housing in the Borough it is essential that the vision (together with the detailed Plan policies) provides the necessary support to ensure both the timely development and maximisation of the potential of all Site Allocations.

The Plan relies heavily on large strategic releases which will take a significant time to come forward and accordingly this places a greater onus in the short term on supporting the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will be easier and quicker to bring forward.

Exemplary Design and the Provision of Infrastructure

Good quality design is important in ensuring that the development created integrates within the existing urban environment and will stand the test of time. Strong infrastructure will also be important to support new growth. However, the plan must be realistic in terms of what may be achieved from smaller sites in order to ensure that over ambitious objectives do not stifle growth or provide a brake on development.

The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

It makes sense to focus initial growth in the plan period within and on the edge of existing settlements. Smaller pockets of development of circa 60 units can be subsumed within existing settlements and help to reaffirm their vitality and viability.

Such development will not normally trigger a need for investment in new infrastructure, beyond any site specific requirements, and will thus be more deliverable earlier in the Plan period and can contribute at an early stage to addressing the Council’s current housing supply deficit.

Furthermore, a high proportion of the Borough is either within the; Green Belt, AONB and AGLV or covered by other local, national and European environmental and heritage designations which limit the potential for development. Whilst significant releases of Green Belt land will be required to meet the Council’s Objectively Assessed Need (OAN) the Plan must embrace the potential, wherever possible, to maximise opportunities on less sensitive land outside of these locations. Land at Site Allocation A28 represents just such an opportunity.

RECOMMENDATIONS FOR SOUNDNESS

UNSOULD: The reliance on the Corporate Plan is not considered to meet the criteria of being ‘Positively Prepared’ and ‘Effective’. It is important that the vision is viewed holistically and that no one component is to be afforded any greater or over-riding weight. This point should be made explicitly within the Vision text.

The Plan Vision should be appropriately flexible and should stand alone as a vision for the entire plan period. Given the failure over ten or more years to deliver the necessary levels of housing to satisfy OAN it is essential that
the plan provides the conditions for ALL of the housing identified to come forward and quickly. The vision should be amended to emphasise the key role of growth in and around villages (particularly in the early years of the plan) and the need for a flexible approach to development standards.

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

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

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

ShrimplinBrown Ltd are instructed by The Burr Family and Ripley Carriage Ltd (our client) to submit the following representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document, June 2016.

ShrimplinBrown have undertaken a comprehensive review of the Draft Guildford Local Plan document as well as the relevant supporting evidence base. In accordance with the guidance set out within the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012, the following representations relate specifically to the “legal compliance” and “soundness” of the draft Local Plan. As well as the specific tests of soundness set out in the NPPF.

Our client are the owners of Site Allocation A45: Land to the rear of the Talbot, High Street, Ripley. These representations should be read in conjunction with the attached summary information which provides further analysis of the site and its capacity for redevelopment.

For ease of reference we have set out our representations within this single document which addresses the relevant questions set out within the questionnaire and makes clear references to specific; paragraphs, policies and site allocations within the draft plan.

**Key Diagram and Proposals Map (Paragraph 1.15)**

Whilst the Key Diagram is diagrammatic the maps included in the Appendix serve to identify the boundaries of sites for development as well as amendments to the boundary of villages. Accordingly, these should be set with clear boundaries as part of the identification of Sites.

It is recommended that for clarity that the Final Proposals Map is shown at a higher resolution.

The inclusion of Site A45 as a Proposed Site Allocation and as part of the extended and inset Ripley village boundary is supported.

**Spatial Vision**

Paragraph 3.2: The Corporate Plan only covers a short timeframe 2015-2020 and is principally a mechanism for stimulating short term actions; for example the adoption of the New Local Plan.

Our Client considers that the Plan Vision should not be dictated by one source. As the Plan evolves so should the Plan Vision in order to reflect the updating of Evidence Base work and input from consultation responses. Our Client has concerns that the Vision does not currently fully reflect the realities of the spatial approach which is by necessity focused on both the release of large significant greenfield sites together with the expansion of towns and villages to facilitate new growth.
Whilst the release of existing brownfield sites (which may be within either urban or rural locations) may be preferable, the realities of delivering the necessary growth in Guildford Borough is that significant greenfield releases are essential. Also with the current significant deficiencies in the provision of housing in the Borough it is essential that the Adopted Plan provides the necessary support to ensure both the timely development and maximisation of the potential of all Site Allocations.

The Plan relies heavily on large strategic releases which will take a significant time to come forward, and accordingly this places greater onus on the need, particularly in the short to medium term, to support the delivery of smaller sites which will often be easier and quicker to bring forward. The amendments to village boundaries (including Ripley), their insetting from the Green Belt and the identification of specific sites, including Site A45, will be important in supporting early releases.

**Exemplary Design and the Provision of Infrastructure**

Good quality design is important in ensuring that the development created integrates within the existing urban environment and will stand the test of time. Strong infrastructure will also be important to support new growth. However, the plan must be realistic in terms of what may be achieved from smaller sites in order to ensure that over ambitious objectives do not stifle growth or provide a brake on development.

The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

It makes sense to focus initial growth in the plan period within and on the edge of existing settlements. Smaller pockets of development of up to 50 units can be subsumed within existing settlements and help to reaffirm their vitality and viability.

Such development will not normally trigger a need for significant investment in new infrastructure, beyond any site specific requirements, and will thus be more deliverable earlier in the Plan period and can contribute at an early stage to addressing the Council’s current housing supply deficit.

It is important that the vision is viewed holistically and that no one component is to be afforded any greater or over-riding weight. This point should be made explicitly within the Vision text.

The Plan Vision should also adopt a holistic approach to new growth which maximises the opportunities to group together wherever possible; new housing with jobs and supporting services. Ripley is a prime location to fulfil this objective. Site A45 offers the potential for housing development during an early stage of the Plan Period and will also satisfy in part the objective of developing on previously developed land.

To comply with guidance within the NPPF and reflect the approach set out within the Council’s Evidence Base (i.e. SHLAA, GBCS) the Council should state a clear priority for the redevelopment of previously developed land and sites within or on the edge of existing settlements prior to the wider expansion sites or new settlement growth. A high proportion of the Borough is either within the AONB and AGLV or covered by other local, national and European environmental and heritage designations which limit the potential for development. In this context the potential to focus growth on less sensitive land outside of these locations, including Site Allocation A45: Land to the rear of the Talbot, High Street, Ripley, should be maximised.

**UNSound:**

The reliance on the Corporate Plan is not considered to meet the criteria of being ‘Positively Prepared’ and ‘Effective’. The Plan Vision should be appropriately flexible and should stand alone as a vision for the entire plan period. Given the failure over ten or more years to deliver the necessary levels of housing to satisfy demand it is essential that the plan provides the conditions for ALL of the identified Site Allocations to come forward as quickly as possible. The vision should be amended to emphasise the key role of growth in the villages (particularly in the early years of the plan) and the need for a flexible approach to development standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
5. The purpose of the Local Plan should be to enhance the quality of life of the Borough’s resident population, not to increase those aspects which cause the most dissatisfaction: traffic congestion and pollution are not eased by increasing the amount of traffic; inadequate infrastructure, whether schools, services, or sewerage, is made worse not better by increasing demand; and building houses, schools or other facilities in places furthest from existing areas where people live or work merely increases problems of inconvenience, travel, and development sprawl.

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

Attached documents:

---

Comment ID: pslp171/2118  
**Respondent:** 17445345 / Albury Parish Council (Joanna Cadman)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

Albury Parish Council objects to the current proposal to build 12, 426 homes in Guildford Borough by 2034 because of the adverse effect that it would have on Albury Parish, the Green Belt and Area of Outstanding Natural Beauty. In particular we object to the lack of improved infrastructure for the Parish of Albury in the Plan. Albury sits on the A248, the main artery connecting the south east of Guildford, Cranleigh, Godalming, Chilworth and Shalford to the A3 via the A25, and London-Waterloo train stations at West Clandon, Horsley and the newly proposed station at Merrow (Guildford East). The Plan would also increase visitor numbers to the AONB without additional buses or cycle routes. We cannot support the Plan until this lack of new infrastructure is addressed and this should also include medical facilities (additional hospital and community hospital), Social Care and Emergency Services.

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

Attached documents:

---

Comment ID: pslp171/3524  
**Respondent:** 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  
**Agent:** Vortal Properties Ltd (Robert Symons)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

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

Spatial Vision

The Plan continues to rely heavily on large strategic releases, most notably from the changes in delivery of housing, which is now heavily weighted towards the end of the plan.
Emphasis, in the short term, should be focused on the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will not require large infrastructure delivery, as well as assisting Guildford meet its identified shortfall in 5-year land supply.

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

Attached documents:

Total records: 64.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy S1 - Presumption in favour of sustainable development
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18094</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1: Presumption in favour of sustainable development

We appreciate that this is model wording. However, experience since this was first produced now shows that this wording is inadequate to communicate accurately to users of the Plan:

1) the concept of sustainable development including the five guiding principles
2) the policies in the NPPF as a vehicle for achieving sustainable development
3) the positive presumption in favour of sustainable development,

While fully appreciating that it is important the Local Plan does not duplicate the NPPF, the reasoned justification could usefully clarify the three components of policy S1.

Object: inadequate, unclear

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2585</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We welcome the additions to 4.1.1 and 4.1.4

4.1.2a The three pronged approach is how the objective of sustainable development is achieved not a definition. It is important to use the definition as agreed for the NPPF relating to meeting needs without compromising future generations and the five guiding principles.

You could also refer to the Government’s commitment for this generation to leave the environment better than it inherited it.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8517</th>
<th>Respondent: 8556673 / Andrew French</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am writing to object strongly to the revised Draft Local Plan and, in particular, the scale and density of development in West Horsley and the surrounding area. The grounds for my objection are set out below.

Policy S1: Presumption in favour of Sustainable Development

A total of up to 385 houses have been proposed on four separate sites in West Horsley, together with an additional 100 houses right on the parish boundary in East Horsley. There are a number of reasons why this is not in line with existing planning policy:

- The proposed housing densities for these sites is well in excess of existing densities in either village;

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

**Attached documents:**

---

Comment ID: PSLPP16/16476  **Respondent:** 8557761 / Nigel Farley  **Agent:**

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policies S1 Presumption in favour of Sustainable Development, 52 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes

1. Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033, The number of homes is too high and unsustainable in Guildford's villages. The Site Allocations list totals 12,698.
2. Village expansion is unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.
3. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village.

1. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.
2. The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.
3. The West Horsley Parish Council and Surrey Community Action Housing Survey conducted in May 2015 identified a limited need for some 20 affordable homes for local people who wish to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

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

**Attached documents:**

---

Comment ID: pslp171/1772  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Presumption in favour of sustainable development

m) Amendment to 4.1.1 is broadly acceptable, but makes the plan a little less predictable in its delivery and in its development promotion and protection.

n) We are unfamiliar with the proposed suggested wording at 4.1.2a which could, as referred to above at (m), lead to unpredictable outcomes, there being no measure of ‘gains’ against which to assess projects.

o) Paragraph 4.14 seems to be an attempt to determine that no development proposals in Guildford Borough should be subject to national policy under NPPF, as the entire Borough falls within the exceptions listed: view Map.

HOUSING TYPE, TENURE AND MIX – TOPIC PAPER (2017)

We broadly agree the background to this paper (excepting any analysis in the SHMA). The section on student accommodation needs to be read in the knowledge that there are various further education colleges and universities in the town, not all of which have campuses in which students do and can live. The SHMA miscalculates inward migration as a result of a failure to properly understand the student population and the processes for registering and deregistering with GPs which acts as a proxy for census data.

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

Attached documents:

Comment ID: PSLPP16/6166  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICIES

It is our understanding that only the text in blue constitutes “policy”. All the remaining text is not. If the accompanying text does not have the force of policy when planning decisions have to be made then a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little and provide little guidance for planning decisions. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of *sustainable* development and becomes a presumption in favour of *any* development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16301</th>
<th>Respondent: 8562561 / Mrs C Sheard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.</strong></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17421</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td><strong>S1 – Presumption in favour of sustainable development</strong></td>
<td><strong>Report Page: 6</strong></td>
<td></td>
</tr>
<tr>
<td><strong>WHPC view: Objects Strongly</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>In brief:</strong> The Policy wording is flagrantly open, unenforceable and ignores the requirements of NPPF paras 7, 8, 10 and 17 in particular.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17449</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>
Policy S1: Presumption in favour of sustainable development

Response: WHPC Objects to this policy

Key reasons:

1. The presence and strategic importance of the Metropolitan Green Belt forming 89% of the Borough area, is not mentioned, though WHPC considers that this is the single most important sustainable development issue that Guildford faces in preventing urban sprawl from surrounding towns in Surrey and from Greater London. Protecting Green Belt is mentioned as one of the 12 Core Planning Principles (refer NPPF 17)

2. Policy S1 states “When considering development proposals we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will work pro-actively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

The policy wording is non-compliant with NPPF 10 which states that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”. Further it does not fit with NPPF 14 which notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply development proposals should be approved in all circumstances.

3. Non-compliance with NPPF 17 which sets out 12 core planning principles to underpin both plan-making and decision-taking. The wording of Policy S1 disregards a number of the 12 principles. All of these principles have equal weight and importance and the Proposed Submission Draft Local Plan 2016 must reflect such in its wording.

4. The Policy wording is flagrantly open and unenforceable where the last paragraph states, “Where there are no policies relevant to the application or they are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.” In addition the presumption in favour of all applications, as stated in this policy, totally overlooks the NPPF requirement for constraints which should be agreed and implemented as part of the Local Plan process. Most, if not all, development in the AONB should be severely restricted, and the Metropolitan Green Belt must remain a substantial constraint to development.

5. NPPF 7 states that there are three dimensions to sustainable development (i) an economic role (ii) a social role and (iii) an environmental role and at NPPF 8, “These roles should not be undertaken in isolation, because they are mutually dependent.” The Monitoring Indicators section to Policies S1 and S2 does not acknowledge that all three dimensions to sustainable development need to be applied to have a correct and acceptable monitoring procedure.

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

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

Comment ID: PSLPP16/5985  Respondent: 8565185 / Mr Dave Robins  Agent: 

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

I OBJECT TO the Local Plan as the development proposed is not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2961  Respondent: 8568193 / Miss Edwina Attwood  Agent:

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/2072  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:

---

Comment ID: pslp171/2315  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

4.1.2a Sustainable development will be achieved by seeking economic, environmental and social gains jointly and simultaneously through the planning system.

I support this statement, but these 'gains' must be demonstrable and preferably measurable and cannot be seen as net gains where there is a loss that needs to be accounted for. This would then be better balanced with the criteria used to determine whether planning should be approved where there are no policies.

Support
Policy S1 -- Presumption in favour

I believe that case law now shows that approval does not necessarily have to be approved when policies are out of date. Planning regs in line with NPPF still apply and these still include protective clauses.

Object

4.14 In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under

I see no reason to include the word 'automatically'? In line with the NPPF the presumption should not apply to protected areas, otherwise they are not protected? The addition of the word 'automatically' adds ambiguity to the policy.

Object

4.1.1 Sustainable development

any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.

Included as part of a three tier framework within NPPF guidelines

Support the statement

4.1.1

unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.

OMISSION

Sustainable development should also be in line with the 12 core principals of planning, some of which are not properly accounted for in this plan.

Objection

I object to the omission of this principle and in particular to the two points listed. (1 A/B)

Objection

Omitted NPPF Guidelines 17 - 1A

be genuinely plan--led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area

Plan led -- Compton was told by the Ex Cllr that Neighbourhood Plans were expensive and that there was little point in doing one as Compton was largely conservation. This has been borne out by development outside the remit of some Neighbourhood Plans as documented by Planning Resource. Furthermore, local people who have worked together to shape their Local Plan have been publicly humiliated via twitter/ on Webcast and in letters to journals. For those not in agreement with the plan (which has been the vast majority of the 7,000 respondents) their opinions are not valued and people feel far from 'empowered'. Furthermore, independent reports commissioned by Parish Councils on behalf of

Object -- Omission

Omission of an independent traffic survey produced by Parish Councils has not been commented on or included as evidence.
the local community, have been largely ignored. They should be part of the evidence base.

<table>
<thead>
<tr>
<th>Omitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>- 1B</td>
</tr>
<tr>
<td>take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it</td>
</tr>
</tbody>
</table>

| More than half of all development (56.7%) is still on Greenbelt and 70% is on countryside, including Greenbelt. This is NOT respecting the Greenbelt, nor have any exceptional circumstances been proposed although it is difficult to think what circumstances would be exceptional enough to ever warrant the degree of loss proposed. |

| Support the statement but cannot see where this is implemented |

4.14

When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.

I support the statement however

I object to the fact that in practice this has not been put into practice.

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have applied permitted constraints ie.given greater protection to their Green Belt, if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN). Flooding issues (particularly in the town) have been accounted for but those around Greenbelt and infrastructure are wholly inadequate. The solution suggested to accommodate inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations. The impact has still not been fully assessed to determine whether the plan is sustainable or whether its impact will blight the future of future generations. The traffic modelling underestimates issues, but remains unaltered / uncorrected. The SHMA has been amended BUT includes fundamental errors, which have been independently verified by three independent commissions. A) By Cllr. David Reeve B) by Neil McDonald and c) Green Balance (B and C are attached).

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worpleston, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape
and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary. No comment has been made about this assessment report, which I believe is a significant piece of evidence.

The air quality assessment (10.1.1) relates to increases in pollution caused by additional development and its impact on SPA. The impact on human life is not included and neither is the B3000 where Nox readings at the A3 end have consistently exceeded recommended safety levels and where an AQMA is now expected. The B3000 would be affected by the Blackwell farm development in particular and possibly by Dunsfold.

4.1.1 Brownfield sites within the 5km SPA zone will hopefully compare current use and potential damage to proposed use?

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

Attached documents:

Comment ID: pslp171/292  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:

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

The central purpose of the National Planning Policy Framework is to plan for sustainable future development and economic growth. That sustainability is partly defined as the ability to clearly demonstrate a contribution to protecting and enhancing the natural environment, including to “improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.” We are pleased therefore to see the environment placed so prominently as one of the four core themes for implementing the Plan’s Spatial Vision for Guildford Borough. With respect to Policy S1: Sustainable development, we also welcome the addition of para. 4.1.2a; “Sustainable development will be achieved by seeking economic, environmental and social gains jointly and simultaneously through the planning system.”

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

Attached documents:

Comment ID: PSLPP16/9332  Respondent: 8573793 / Harry Eve  Agent:

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

Concluding comments
As stated at the beginning, I require that the points that I have raised be included in the Examination process and that they are responded to.

In summary, this draft Local Plan would have an adverse impact on quality of life, biodiversity, agricultural production, and on local businesses through increased traffic congestion, loss of countryside and destruction of village communities. It will fail to provide genuinely affordable housing or meet genuine local needs. The evidence is weak, poor, misleading and, in some cases, absent. It is an attack on the quality of life, wellbeing and health of the residents of Guildford. The identified infrastructure requirements are merely the tip of the iceberg that will sink Guildford if this plan goes ahead.

Our Government and local authority will be failing in their duty if this plan is approved.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13032</th>
<th>Respondent: 8573793 / Harry Eve</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object

50. This requires a clear definition of what is regarded as “sustainable” that has the acceptance of residents. Building on greenfield sites is not sustainable because, even now, our country cannot feed itself without relying on a high proportion of imported food and our wildlife is diminishing under the pressures of agricultural intensification, increasingly damaging leisure uses of the countryside and loss of habitat to development. Development of the sites allocated for housing outside the town centre, together with the proposed insetting and general weakening of planning restraints enshrined in draft Policy P2, would result in large amounts of additional vehicular traffic and that cannot be regarded as sustainable. This policy fails to address the core planning principles set out in NPPF 17.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5947</th>
<th>Respondent: 8575585 / Ian Macpherson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Strategic Policies**

Policy S1: Presumption in favour of sustainable development

This effectively follows NPPF.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6975</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

S1 Strategy–Presumption in favour of sustainable development.
Support.

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

Attached documents:

---

In summary I object to the proposed Submission Local Plan because

- The housing target is too high, based on a flawed SHMA
- The number has not been reduced to take account of Green Belt and infrastructure constraints
- Green Belt has been treated as a bank of developable land rather than given the protection expected under the NPPF- 65% of proposed housing is on Green Belt and only 35% on urban and brownfield land
- The number of houses (over 5,000) proposed for a small area in the east of the Borough, around six linear miles between Burpham and Wisley, is disproportionate and will radically change the character of this part of the Borough.

In more detail-

**Policy S1**

I object to this policy as its wording is too vague. It provides no guidance on how conflicts between economic, social and environmental considerations (conflicts between economic and environmental issues are frequent in Guildford Borough) are to be resolved, and which factors have priority.

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

Attached documents:

---

4.1.2

The plan makes multiple references to sustainable development. However most development put forward appears to need mitigating. ‘Actual adverse impacts’ are singularly missing from any commentary or policy. When considering noise, air pollution or lack of infrastructure, on 53 occasions ‘mitigation’ is used to claim an improvement in sustainability of the Plan’s proposals.
There are multiple references to ‘should’ but never ‘shall’ when referring to the provision of infrastructure. In short these policies are not future proof and strongly suggest sustainability problems, 57 in all, with only 4 providing sustainable solutions. For, ‘to mitigate’ strongly suggests something has failed during the planning process: if it had not failed no mitigation would be required.

[Page 27, paragraph 4.1.1]

Page 27 4.1.2a
The definition below is not recognised. The Minister’s statement is more definitive.

[Quote from the Minister reads "Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices. We must respond to the change

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

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

Comment ID: PSLPP16/12165  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/13485   Respondent: 8582977 / Guildford Environment Forum (John Bannister)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The same is true of Guildford itself with all approach roads grid-locked at certain times of day. The cost to business of congestion is huge with the adverse consequences impacting residents through health damaging air quality and road accidents. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. No one is asking for a 40% increase in retail in Guildford, except maybe Retailers, yet that will exacerbate the adverse effect of more traffic coming to Guildford. Car parking charges must be increased in line with cities like Cambridge if GBC is serious about reducing congestion. A tunnel under the A3 will be hugely expensive and the money would be better spent improving rail travel between Portsmouth and London and the rail and bus links to adjacent locations.

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

Attached documents:

Comment ID: PSLPP16/15518    Respondent: 8585601 / Jennie Kyte    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1: Presumption in favour of sustainable development

Policy Box S1 and paragraphs 4.1.1 to 4.1.4: The term ‘Presumption in Favour of Sustainable Development’ is ill-defined and difficult for planning officers to interpret. Consequently, some extremely unsuitable developments are reaching planning application stage. Even if voted against unanimously by councillors on the Planning Committee, the developer using the policy ‘Presumption in Favour of Sustainable Development’ is in a stronger position to appeal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY S1: Presumption in favour of sustainable development

Introduction

4.1.1 The following words have been added:

“…..unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.”

The word ‘suggest’ is an interpretation of the NPPF. The word ‘indicate’ is used in the NPPF (14) and in this context it is stronger than the word ‘suggest’.

I support the addition of this sentence, but object to the word ‘suggest’.

Reasoned Justification

4.1.4 While it is welcome that protected sites listed in the NPPF are acknowledged, the word ‘automatically’ in the added sentence: “In accordance with the NPPF the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs,) land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of floods” weakens the sentence and the protection given to these protected sites. It implies that the presumption policy applies, but not automatically. It should be that the presumption does not apply to restricted areas except in exceptional circumstances.

Sites listed in the NPPF where development should be restricted should be listed in Policy S1 box.

The Area of Great Landscape Value should also be listed as restricted in Policy S1 box.

I support the sentence in 4.1.4 above, but object to the word ‘automatically’.

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

Attached documents:
Improved sewage works, enhanced transport infrastructure and improved air quality are a prerequisite to any future development.

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

Attached documents:

---

Comment ID: PSLPP16/6619  Respondent: 8585697 / Laurence Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Presumption in Favour of Sustainable Development  Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.”

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

Attached documents:

---

Comment ID: PSLPP16/15870  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

We object to this policy which presumes sustainable development in line with the NPPF. It is our contention that the proposal to build 13,860 homes across the Borough is not sustainable. The policy fails to recognise that rural areas with inadequate road and other infrastructure cannot cope with development on this scale and is therefore unsound.

NPPF 10 notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas.”

Policy S1 says: “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area.”

There is a subtle shift of emphasis from the NPPF’s “need to take local circumstances into account” to GBC’s “proposals can be approved wherever possible.”

There are twelve planning principals outlined in the NPPF which the Local Plan should take into account. Some seem to be disregarded, for example:

“…take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the
intrinsic character and beauty of the countryside and supporting thriving communities within it.”

“…support the transition to a low carbon future.”

“…contribute to conserving and enhancing the natural environment and reducing pollution”

“…encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value.”

These values do not sit easily with the proposed strategic developments.

Another statement from Policy S1 gives serious cause for concern.

“Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.”

This offers a degree of flexibility that is tantamount to offering carte blanche to developers, and the presumption in favour of applications fails to recognise any constraints such as the Green Belt.

Policy S1 looks to securing “the economic, social and environmental conditions in the area” but fails to acknowledge the conflict that can often occur between economic growth, environmental protection and social justice. There are difficult decisions to be made but no guidance is given as to how dissension might be resolved.

This policy reveals a distinct bias towards development – one might almost add at any price. References to sustainability are nebulous, and inconvenient constraints are swept aside. Perhaps the most shocking omission is the lack of commitment to uphold Green Belt boundaries.

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

Attached documents:

---

Comment ID: PSLPP16/8067  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

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

I am writing in support of the Local Plan and in support of the University of Surrey’s part in that plan.

The University plans are robust, professional and show genuine smart growth; they support sustainable transport, relieve critical infrastructural issues and deliver high levels of employment and affordable housing. Those plans need to be prioritised within the Local Plan.

My comments on the most material of the policies are as follows.

Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 “Sustainability” and Policy S2 “Housing number”.

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

Attached documents:
### Comment ID: PSLPP16/6395  Respondent: 8590753 / Mr Michael Anning  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

**Attached documents:**

### Comment ID: PSLPP16/2106  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

**Question 6. The content of the plan.**

**Policy S1: Presumption in favour of sustainable development**

We suggest adding to the policy as follows (underlined); “..We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, without compromise to any one of these (or words to that effect).

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

**Attached documents:**

### Comment ID: pslp171/279  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

Policy S1: Sustainable development. With reference to para 4.1.4, is the list here (“..Birds and Habitats Directives…flooding.”) drafted to be inclusive? If this is the case, we are interested to know whether Local Wildlife Sites (Sites of Nature Conservation Importance in Surrey), as well as Regionally Important Geological Sites, are also referable. If they are not, there is clearly an incentive here for designating SNCl as Local Green Spaces (which has indeed begun to proceed through several Neighbourhood Plans).

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

**Attached documents:**
For the avoidance of confusion, this policy should set out the specific policies that restrict development as set out in the NPPF e.g. the Birds and Habitats Directive, SSI, Green Belt and AONB.

The section on “Monitoring Indicators” should state that the Monitoring Report will cover all three aspects of sustainable development as set out in the NPPF i.e. economic, social and environmental. Currently it focuses on the provision of additional housing and employment land. It should also cover:

- A regular assessment of the ability of the local infrastructure to cope with the increased development (housing and commercial development).
- An environmental impact assessment of new development to check that this was as planned
- Reductions in targeted housing and employment land if new demographic and other studies indicate lower growth than forecast.

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

Attached documents:
Comment ID: PSLPP16/11852  Respondent: 8595649 / Paul Kassell  Agent:

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

The wording of policies is vague. This, coupled with a presumption in favour of development offers no protection. Use of words such as “should” rather than “must” encourages ambiguity.

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

Attached documents:

Comment ID: PSLPP16/17377  Respondent: 8596673 / Peta Malthouse  Agent:

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

I object to the proposals for housing in the Town Centre S1 and S2

I object that the Policy does not include a density figure, or range, for new housing within the urban area of Guildford, or Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt surely it is time to be pragmatic and realistic by specifying higher densities for building where this can be done without harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for independent older people that wish to downsize from their current residential accommodation s well as young professional couples and singles.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required..

Similarly there is no provision or guidelines for acceptable house types in the greenbelt areas which should be there and enforced to retain openness

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

Attached documents:

Comment ID: PSLPP16/11639  Respondent: 8597025 / Mr Peter Bennett-Davies  Agent:

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

2. Number of new houses and density (Policies S1, S2, H1 and H2)

I object to the proposals relating to the number of new dwellings and the density of such housing. A 13,800 homes increase is proposed across the Borough over the Plan Period to 2033, representing a 25% increase approximately in the Borough’s housing stock. This increase is too high and for West Horsley in particular, the proposed increase of 385 homes translates to 35% growth which is grossly disproportionate. For East and West Horsley, the 533 homes proposed to be delivered in the first 5 years of the Plan Period on the six proposed sites (ref A36 to A41) are calculated at much higher densities than currently exist within the villages and if allowed would be totally out of character with the existing mix of different housing styles and layouts within the villages.
The home building proposals for the Horsleys are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

I have recently received and thoroughly read two independent Assessments of the West Surrey SHMA’s Objectively Assessed Number (OAN), one prepared by Neil McDonald for a grouping of residents associations and parish councils located in the Borough and the other by Clandon & Horsley Ward Councillor David Reeve. Both studies report on finding the same error in the G L Hearn West Surrey SHMA document. The effect of the error results in an overstatement of the number of homes needed through the Plan Period by a significant quantity, possibly by 2,745 homes. Other independent individuals have stated on numerous occasions to GBC, that the OAN is flawed but the Borough Council has chosen neither to listen nor to scrutinise the SHMA. The population growth assumed, will be excessive and unsustainable for Guildford, a gap town with many environmental, physical and infrastructure constraints.

I object to the disproportionate allocation of housing to (a) East and West Horsley (b) rural villages, particularly on the eastern side of the Borough.

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

Attached documents:

---

**Comment ID:** PSLPP16/15577  **Respondent:** 8597793 / Pirbright Parish Council (Lindsay Graham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1 Sustainable Development

While we support the commitment of the Local Plan to sustainable development, we would note that this should only apply where development is genuinely sustainable in terms of its location and in the effects on the environment, on communities and the economy.

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

Attached documents:

---

**Comment ID:** PSLPP16/17235  **Respondent:** 8601473 / Cranley Road Area Residents Association (Rose Davies)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the proposals to expand Guildford.

The town is large enough already. It cannot support expansion by a quarter or more.

In recent years it has accommodated many thousands of newcomers.

Additional house building will lure even more of these people to the town, placing even greater strain on its infrastructure, which is already buckling under the weight of demand from the influx.

Panic responses by an incompetent and suspect central government should not have been taken up with alacrity and reflected in Guildford Borough Council’s sycophantic proposed Local Plan.
It is the professional duty of Guildford’s staff and councillors to resist outside pressures and consider the future good of the town.

This does not include planning towards creation of a new “outer London borough”.

Further housing expansion should be circumscribed and avoided whenever possible.

The character of Guildford and its surrounding countryside should be preserved for present occupants and future generations.

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

Attached documents:

Comment ID: PSLPP16/11177  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create 3 'new towns' each of approx. 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of lack of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes, etc., on-site, as does Dickens Heath, Solihull, of which the GBC Pegasus report cites as its model.

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

Attached documents:

Comment ID: PSLPP16/17500  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

5. Infrastructure

CPRE objects at the failure to supply a satisfactory infrastructure strategy or delivery plan for Guildford in time for this consultation. In the Surrey Infrastructure Study of January 2016 the total infrastructure cost required was assessed to reach £1.162 billion. The total secured funding was given as £75.8 million and the total expected funding was estimated at £568.2 million. This left a funding gap of £518 million which is equivalent to 55% of the total costs budget. CPRE OBJECTION.
CPRE recognises that many major infrastructure decisions affecting Guildford District are outside the control of GBC and that this makes planning ahead for a long period almost impossible, especially at a time when the economic outlook is so uncertain and difficult to predict. Many decisions which can only be outlined as aspirations depend on infrastructure provision being agreed by Highways England (M25 and A3), Historic England, Natural England, Network Rail, the Surrey County Council, and Thames Water. The constraint of providing SANGS in connection with the Thames Basin Heaths has also to be taken into account.

GBC are making ambitious proposals for housing regardless of the lack of adequate infrastructure in support. Without this being provided before development is begun, there will we believe be a real threat of intensified disruption caused by traffic congestion, particularly at peak times, in many communities. CPRE OBJECTION.

Surrey’s motorways already carry 80% more traffic than the average for the South East and our A roads 66% more than the national average. CPRE has been heavily concerned with traffic management issues across the county for many years. We have served on the M25 Orbit Committee and were involved with the consultation on the Hindhead tunnel, the Cobham Motorway Service Area and the Hard Shoulder Running Initiative for the M25 between Junctions 5 and 7. We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. We expect to become involved in monitoring the North Downs rail proposal linking Reading to Gatwick via Guildford.

We think it unrealistic for Cross Rail 2 to be discussed at this continuing time of likely austerity as a means of freeing up the overburdened rail link to Waterloo from Guildford and Woking. We do have, however, to recognise the planning challenge that the high percentage of commuters travelling to London for work represents, together with a comparable number coming into both Guildford and Woking for daily employment. It is disheartening to see the inadequacy of the Solum proposal for Guildford’s mainline station which did not sufficiently address the issues that concern commuters or residents most. CPRE OBJECTION.

The detrimental impact of traffic congestion on quality of life across Surrey is a topic of importance to everyone. The location of schools and their school runs are of course a daily cause of traffic problems. The proposal for the Hoe Valley school and its associated Leisure and Sporting facilities will be on Green Belt land and will certainly not improve matters on the A320 at Mayford on the road between Guildford and Woking, even if Paragraph 89 of the NPPF allows for greater flexibility to be shown for outdoor sport and recreation within the Green Belt, as long as it does not conflict with its openness. The Woking Traffic Survey acknowledges that this proposed development will have a damaging effect on congestion on the A320 and A322 as well as other local roads. CPRE OBJECTION.

Congestion on A roads leads to the overuse of B roads by speeding traffic that exceeds the relevant limits which are invariably not enforced. The B367 from Ripley to Pyrford is an example of this problem. Speed limits for the Pyrford Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the road itself, as at Newark lane in Ripley, slows traffic down.

Other roads such as the B380 serve as a link between the A324, the A322 and the A320 and all carry excessive traffic for their size. An example of a C road which is already under severe traffic pressure is Salt Box Road which forms the link between the A320 and the A322 as well as funnelling through traffic between the M3 and the A3. Burdenshot and Goose Rye Road are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon station which is located within Woking Borough, where a new Park and Ride location is proposed. The question has to be
asked in this context as to how this proposal can be considered given the Kemishford bridge access problem and the unsuitability of the bridge near the station at Prey Heath Road with its long history of flooding issues.

CPRE gives these examples of busy roads where house building on the scale envisaged for Guildford and Woking will only make traffic matters much worse. Further analysis is required in both boroughs of the impact of the huge housing projects proposed and the positioning of the school and park and ride facilities they envisage. CPRE OBJECTION.

CPRE questions whether all the development envisaged for Guildford can be considered sustainable and deliverable in the time required. Paying for all this investment will be very hard to achieve through the Community Infrastructure Levy (CIL) which is one of the motivating forces behind GBC’s attempt to accelerate passage of the draft Local Plan and use as much Green Belt land in the process as they can. CPRE again maintains that this approach is misguided as it places too much emphasis on economic priorities at the expense of environmental policies which have served the community well and need to be supported rather than undermined. CPRE OBJECTION.

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

Attached documents:

Comment ID: pslp171/1976  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

One of the problems of the NPPF relates to how one defines the words “sustainable development”. CPRE welcomes to some degree the amendments made to paragraphs 4.1.1 and 4.1.4 to the extent that they help to clarify this issue. However, we would seek to improve the 4.1.1 amendment by removing the word “significantly” and replacing the word “suggest” with the word “require”. The amendment we would seek to make to 4.1.4 would be the removal of the words “not automatically” in the second sentence.

We note, however, that the words Area of Great Landscape Value, whilst included in the heading of Policy P1, are omitted in the list of sites to be protected. This appears to be because this countryside designation is omitted from Footnote 9 on page 4 of the NPPF. We would argue for consistency sake that this list should accordingly be amended.

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

Attached documents:

Comment ID: PSLPP16/8649  Respondent: 8608225 / Valerie Jenner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local plan (Policy S1) on the grounds that the development proposed is not sustainable. How on earth can the total development
of new houses some 13,860 be accommodated in the borough with no improvements to the infrastructure. We are already at bursting point

with access to schools and doctors, inadequate bus services, sewage removal etc. and the road network is fast becoming gridlocked at rush hour.

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

Attached documents:

**Comment ID:** PSLPP16/1229  **Respondent:** 8608865 / WBDRA. (David Bird)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

WBDRA is generally supportive of this policy BUT there should be some reference of Para 119 of the NPPF (maybe a footnote?) which says "The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined".

This addition would clarify the issue beyond reasonable doubt!

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

Attached documents:

**Comment ID:** PSLPP16/2382  **Respondent:** 8609217 / West Clandon Parish Council (John Stone)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Comments on specific policies

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

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

Attached documents:

---

Comment ID: PSLPP16/9083  Respondent: 8609377 / Mr Andy White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

This is very selective in its interpretation of the definition provided with the NPPF and is unsound.

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

Attached documents:

---

Comment ID: PSLPP16/12576  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of
developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

---

Comment ID: PSLPP16/9832   Respondent: 8627393 / Worpleston Parish Council (Gaynor White)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

<table>
<thead>
<tr>
<th>S1</th>
<th>Presumption in Favour of Sustainable Development</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.”</td>
</tr>
</tbody>
</table>

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

Attached documents:

---

Comment ID: pslp171/2469   Respondent: 8627393 / Worpleston Parish Council (Gaynor White)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

|    | Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.” |

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

Attached documents:

---

Comment ID: PSLPP16/10064   Respondent: 8640353 / Julian Cranwell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

We object to policy S1 as stated and the presumption in favour of sustainable development While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also
fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.
In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government’s international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5231</th>
<th>Respondent: 8655233 / Kay Mackay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>, is Sound?</td>
<td>, is Legally Compliant?</td>
</tr>
</tbody>
</table>

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3153</th>
<th>Respondent: 8655233 / Kay Mackay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Furthermore, the additional information below supports the need to scrap these plans:

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1 Sustainable Development

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both planmaking and decisiontaking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long term impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”.

This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by overdevelopment, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/1369  Respondent: 8671969 / Valerie Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1

I object to the policy that sustainable development should be paramount in GBC’s planning, particularly as no explanation of what this means is given in the paperwork.

There is therefore no obvious framework to support this intention.

The Plan intends to "secure development that secures the economic, social and environmental conditions in the area” but fails to discuss how conflicts between these various aims will be resolved.

Basically I object in the strongest terms to ANY development in the Greenbelt for housing, on the promise of the protection of which, the GBC Councillors were elected.

Government guidelines state that development for housing is not a valid reason for building on Greenbelt, even if there is not enough other land available, which I dispute as GBC are intending to develop most of the brownfield sites with businesses, shops and industry, rather than housing.

Obviously, GBC's intention to encourage building and approve planning applications "without delay," and "wherever possible" suggests that building will be allowed anywhere, without proper consideration.

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

Attached documents:

Comment ID: PSLPP16/2300  Respondent: 8671969 / Valerie Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

OBJECTIONS TO DRAFT LOCAL PLAN 2016

Policy S1
I object to the policy that sustainable development should be paramount in GBC's planning, particularly as no explanation of what this means is given in the paperwork.

There is therefore no obvious framework to support this intention.

The Plan intends to "secure development that secures the economic, social and environmental conditions in the area" but fail to discuss how conflicts between these various aims will be resolved.

Basically I object in the strongest terms to ANY development in the Greenbelt for housing, on the promise of the protection of which, the GBC Councillors were elected.

Government guidelines state that development for housing is not a valid reason for building on Greenbelt, even if there is not enough other land available, which I dispute as GBC are intending to develop most of the brownfield sites with businesses, shops and industry, rather than housing.

Obviously, GBC's intention to encourage building and approve planning applications "without delay," and "wherever possible" suggests that building will be allowed anywhere, without proper consideration.

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

Attached documents:

---

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. "The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3 In my view Policy S1 is a non-policy.

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

Attached documents:
I object to this Policy as the development proposed will not be sustainable (Policy S1).

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed.

Policy S1 is seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity.

Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. Over 60 percent of the proposed housing would be in the Green Belt. The commitment to approve planning applications “wherever possible” and “without delay” is prejudicial. Countervailing references to sustainability are so vague that the National Policy Planning Framework (NPPF) presumption in favour of sustainable development becomes a presumption in favour of any development at all.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. These sites are also unsuitable since they will not be supported by sustainable access transport. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. There are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided at much lower cost.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
It seems to me that the plan is draconian in approach, whilst failing to absorb the previous genuine concerns of local residents regarding infrastructure and traffic problems. Furthermore, the plan seems to assume the annexation of Green Belt, contrary to Governmental stipulations.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT) for the following reasons:

• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

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

• I object to the fact that this proposed plan does not meet the needs of local communities
• I object to the fact that insufficient truly affordable housing is being proposed. There is no evidence that any calculations at all have been done; no sensitivity analysis on interest rates; costs of running cars
• I object to the impact of further congestion on local village roads and
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11624  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

No definition of sustainable development. The policy also needs to set out any principles for applying sustainable development in practice for local planning decisions, which could have serious long-term impacts.

No environmental protection.

It doesn’t reflect issues of transport and infrastructure in the rural areas, where scale and density are unsustainable.

It does not say how each element is to be weighted or conflicts resolved.

Where is the Green Belt in the Policy - to protect the green areas in perpetuity, stopping urban sprawl and villages converging.
Commit to Green Belt boundaries and protections. It is what is so great about our borough.

“Wherever possible” and “without delay” is not the sort of language to be used in a serious planning document like this, it is too open to be used by any half decent developers lawyer.

Where are the 12 Core Planning Principles set out in NPPF?

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

Attached documents:

Comment ID: PSLPP16/9049  Respondent: 8723809 / Sally Blake  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to POLICY S1 – Presumption in favour of sustainable development

• No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No statement of how economic, social and environmental impacts should be balanced.
• No reference to most of the NPPF Core Planning Principles.

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

Attached documents:
I have lived in the borough for 46 years and have become increasingly alarmed at the constant erosion of rural amenities and increasing pressure on local services and traffic. I am aghast at the proposed plan which will only exacerbate further these issues.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objection to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the...
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

**Comment ID:** PSLPP16/3493  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I have lived in the Guildford area for 46 years and am devastated by the latest proposals in the Guildford Borough Councils Local Plan. The Council appears to have no regard for the wishes of the local residents and just ploughs ahead with its own agenda to make Guildford into an economic growth area which is not wanted by the local population. People who choose to live in this area want to be surrounded by green belt countryside and do not and do not wanted it covered in housing estates.

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/927</th>
<th>Respondent: 8726721 / Rosemary Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I do not know enough about the law to judge whether or not the document is legal. I object to the principle of a presumption in favour of development rather than a presumption in favour of the needs of the environment and local people.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9472</th>
<th>Respondent: 8728865 / Neville Bryan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Object</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The building of 14000 houses and allowing excessive employment growth in an already overcrowded part of the Surrey is by definition unsustainable.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>This wording is based on the National Planning Policy Framework (NPPF) however the policy fails to recognise that development in rural areas, with inadequate transport and other poor infrastructure, cannot cope with the proposed scale of development.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>This should represent an absolute constraint on development and housing and that constraint should be reflected in policy S2.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>There is no account of the impact of the University of Surrey past and present.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2031</th>
<th>Respondent: 8729217 / Karen Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I support the addition of the conditional statement “unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted” (4.1.1). And I also support the new statement in Reasoned Justification that:</td>
<td></td>
</tr>
</tbody>
</table>
“When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” (4.1.4)

However, Guildford Borough Council (GBC) appears to have taken little or no account of local circumstances (namely Guildford’s inadequate transport infrastructure and chronic traffic congestion), and little or no account of the specific policies in the NPPF, when putting forward its proposed development sites.

[Figure 1] - Does a development of 1800 homes on this farmland on the Hog’s Back at Blackwell Farm and an access road cutting through the AONB, as shown above, constitute sustainable development?

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

Attached documents:  

Comment ID: PSLPP16/6696  
Respondent: 8731649 / Ian Slater  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/13916  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. POLICY S1
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

In addition to the increase in congestion that would inevitably occur, there would be a human cost in increase traffic accidents.

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

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both decision-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5107</th>
<th>Respondent: 8741377 / Lisanne Mealing</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>is Sound?</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>( )</td>
<td>( )</td>
<td>( )</td>
</tr>
</tbody>
</table>

I am disappointed to have to Object to the 2016 draft local plan, despite promises that the initial responses had been taken into account, for the following reasons:

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The scale of the proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads? We already have problems with not being in the catchment area of a single secondary school where children from our village can continue as a community to be together. There are waiting lists for all of our health services and our bus service is continually being cut.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3186</th>
<th>Respondent: 8741761 / June Yorath</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>is Sound?</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>( )</td>
<td>( )</td>
<td>( )</td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13871</th>
<th>Respondent: 8743137 / Ben Woodford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Godesen Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
rigour that would enable positive future assessment of the policy impact. NPPF para 14 footnote 9 "including land
designated as Green Belt" already positively permits development to be restricted, it does not "suggest that development
should be restricted". Much of Guildford Borough lies within 5km of the Natura 2000/SAC/SSSI site Thames
Basin Heaths Special Protection Area and requires mitigation under the Birds & Habitats Directives as enabled in UK law
by The Conservation of Habitats and Species Regulations 2010. Furthermore, as recognised in this document, 89% of
Guildford Borough land is designated as Metropolitan Green Belt. Both these designations of Guildford Borough land
have widespread impact and the NPPF provides opportunity for the council to recognise opportunities to restrict or
mitigate development. Failure to do so in Policy S1 flies in the face of the reality of such land designation in the borough.
Guildford being defined as a "growth bub" in the Enterprise M3 LEP economic plan at the prompting of DBIS with no
appropriate evidence brought forward, as is required in Local Plan development, is no basis on which to ignore such
land designations (i.e. Green Belt) and in policy description.

I propose that the final sentence in para 4.1.1 should be amended as follows:
"This means that Local Plans must positively seek opportunities that meet the area’s objectively assessed development
needs and be flexible enough to adapt to rapid change unless the adverse impacts of doing so would significantly
outweigh the benefits or specific policies in the NPPF where it suggests, as in NPPF para 14 footnote 9 'sites protected
under the Birds and Habitats Directives (see NPPF para 119 where the presumption in favour of sustainable development
(NPPF para 14) does not apply where development requiring appropriate assessment under the Birds or Habitats
Directives is being considered, planned or determined) and/or designated as Sites of Special Scientific Interest; land
designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty; designated heritage assets; and
locations at risk of flooding', that development should be restricted."

Para 4.1.4
I object to the additional wording added to page 28 para 4.1.4 "When implementing Policy S1, local circumstances will be
taken into account to respond to different opportunities for achieving sustainable development." Once again, it is too
flexible an interpretation of NPPF para 14 lacking the rigour that would enable positive future assessment of the impact
of Policy S1.

I propose that the wording of the second sentence in para 4.1.4 should be amended as follows:
"When implementing Policy S1, local circumstances that match those described in NPPF para 14 footnote 9 and NPPF
para 119 (see following) will be taken into account to restrict opportunities for sustainable development."

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

Attached documents:
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/8578  Respondent: 8751105 / Amanda Harris  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/12526  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/5062  Respondent: 8770177 / Phil Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3121  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/4884  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

**Comment ID:** PSLPP16/16688  **Respondent:** 8772801 / David French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

**Comment ID:** pslp171/2998  **Respondent:** 8772801 / David French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/1138  Respondent: 8776417 / Nici Holland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the Local Plan for a number of reasons.

1. No definition of “sustainable development” is given. The policy does not outline the long-term impact on economic, social and environmental issues in the area. Under this policy, any development will qualify as “sustainable”. The Green Belt is an example of sustainable development in practice and should be protected. It would be a major and irreversible change, if the Green Belt is built upon and would turn our fairly rural borough into an urban/suburban one like Woking. Once gone it is gone forever and it is not the Council’s right to give it away.

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

Attached documents:

---

Comment ID: PSLPP16/17019  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16559</th>
<th>Respondent: 8795329 / Nicholas Williams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan for the following reasons.

**I object because The proposed development is not sustainable.** The volume of proposed new houses will damage local communities which have no need for these houses. Public transport is totally inadequate, meaning a huge increase in the number of cars. Why not develop in urban areas, on brownfield sites?

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1510</th>
<th>Respondent: 8795649 / G Pask</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3379</th>
<th>Respondent: 8796321 / Nick Etches</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

5. I **object** to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I **object** that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of
developers reneging on commitments as the 'money runs out' even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

---

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. It would make sense to me to use any brownfield sites in the town centre for residential use rather than more shopping or business use as the internet has reduced the number of pedestrian shoppers and a lot of “hot/sharing of desks” now takes place.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3155  Respondent: 8798881 / H L Cousins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

E. Policy S1 Presumption in favour of Sustainable Development– Our Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/12735  Respondent: 8800545 / Bill Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to this Policy as the development proposed will not be sustainable (policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Policy S1 is deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.

The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan.

Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy largely disregards the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2976</th>
<th>Respondent: 8801665 / Charlotte Edwards</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>( ) , <strong>is Sound?</strong></td>
<td>( ) , <strong>is Legally Compliant?</strong></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14432</th>
<th>Respondent: 8801953 / Sarah Relf</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>( ) , <strong>is Sound?</strong></td>
<td>( ) , <strong>is Legally Compliant?</strong></td>
</tr>
</tbody>
</table>

POLICY S1

I object because:

- The policy does not give any definition of “sustainable development”
- It ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17
- It promises “development that secures the economic, social and environmental conditions in the area” without any recognition that these factors often conflict
- It fails to commit to uphold Green Belt boundaries and protections

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

**Attached documents:**
POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

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

Attached documents:

There is no definition of sustainable, so how can anyone judge whether or not any development proposed meets the sustainable criteria used GBC - not even a definition if we are told what those criteria are. So we have to judge sustainability for ourselves, using our own personal sustainability criteria. For myself, my sustainability criterion is very simple, and is "Will the changes proposed mean a better place for those who follow me?" Against this yardstick, this plan fails. If implemented, it would have a profound and long lasting negative impact on the countryside within the borough - a countryside that makes England unique, and here in GBC, we have some of the very best of the English countryside. The views that we take for granted have evolved over centuries, as has land uses for the land in the borough. But with very little thought, GBC can destroy them. Consider what the countryside will look like if all the developments planned are completed - Blackwell Farm would be lost and with it some of the most iconic views in the borough, both into the town and out from the town. Driving along the A3 from the M25 junction into Guildford there would be a large, high density urban area at Wisley, another a few miles further on at Garlick Arch, and then yet another at Gosden Hill Farm. A large urban area will be created by the forced amalgamation of East and West Horsley, and another by the
forced merger of Normandy and Flexford. But all will be well because Ash Green will be prevented from merging with Ash and Tongham! The wanton destruction of a countryside that took centuries to develop, and that is loved by thousands of residents and visitors alike. And this is called "sustainable" - what nonsense!

The additional 25,000 to 30,000 cars that the developments will generate will increase air pollution very considerably - and this has not even been considered in the plan. This is roughly a 50% increase in the number of cars and vans within the borough. Across the borough there are areas that are already above legal limits - but Guildford has no AQMAs, and no action plan of any description to deal with existing levels of poor air quality - so what of the future? How can it be called sustainable to ignore a problem that already kills about 55 residents a year - how many more will die because of this extra pollution load? How many more children will have stunted brain and lung development because of the additional air pollution this extra traffic will bring? Does anyone within GBC even care? Apparently not, there is no policy to tackle air pollution within the plan. However, this means the plan is not legally compliant.

And what of the high quality farmland that is being lost - at Wisley, at Blackwell Farm and at other locations across the borough. The UK already imports 40% of food consumed (net) - but building on farmland means that our ability to feed ourselves will diminish even more. And yet GBC call this plan sustainable.

So, on behalf of those who will follow me, I am forced to say that this plan is not sustainable.

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

Attached documents:

Comment ID: PSLPP16/3637  Respondent: 8808321 / Ian Peacock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

Comment ID: PSLPP16/5265  Respondent: 8810113 / Louise Stewart  Agent:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

### 1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2887  Respondent: 8810849 / Charles Lee  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/9252  Respondent: 8812097 / Clare Benzikie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/9866  Respondent: 8813505 / Peter Grimble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send.

One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp171/3176  Respondent: 8813601 / Gaenor Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:
Comment ID: PSLPP16/10220  Respondent: 8817121 / Celia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: PSLPP16/17079  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

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

Attached documents:

Comment ID: pslp171/3170  Respondent: 8818433 / Julian Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/16436  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
Comment ID: PSLPP16/156  Respondent: 8823553 / Rick Day  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

There has to some agreement over the amount of growth that requires this sustainable development. Otherwise we will keep giving up Green Belt to more new villages, expanding existing villages and increasing density all of which destroy the character of the local environment and why we, the voters, chose to live here!

Comment ID: PSLPP16/13151  Respondent: 8824609 / Richard Sands  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

Comment ID: PSLPP16/13158  Respondent: 8824609 / Richard Sands  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Comment ID: PSLPP16/17039  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1533  Respondent: 8825409 / Alan Gilbertson  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Policy S1-Presumption in favour of sustainable development</strong></td>
<td></td>
</tr>
<tr>
<td>The second sentence of the first paragraph states that applications will be approved ‘wherever possible’. This is an unwarranted and unwelcome extension of the wording of the NPPF and we request that this must be corrected to bring the policy in line with the NPPF. Therefore the words ‘wherever possible’ should be deleted from the policy.</td>
<td></td>
</tr>
<tr>
<td>We object to this policy as it is unsound as it does not follow the requirements of the NPPF.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6462  Respondent: 8825985 / Christina Appleby  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )</strong></td>
<td></td>
</tr>
<tr>
<td>The selection of strategic sites should take account of the need for development to be sustainable. In my opinion the developments in East Horsley and adjacent parishes, West Horsley and Ockham, do not take account of the strain which the increased numbers of people and cars will place upon the local infrastructure, particularly the roads in to and through East Horsley, which are already overloaded. It has not been demonstrated that these roads are capable of being significantly improved.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5565  Respondent: 8826081 / Simon Wilcockson  Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 draft local plan for the following reasons: <strong>I object to the local plan as the development proposed is not sustainable (Policy S1)</strong> The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

The definition of sustainable development in policy S1 is flawed as development also needs to be consistent with the infrastructure that is available (transport, education, health services, flood prevention, utilities).

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

Attached documents:

Comment ID: PSLPP16/13364  Respondent: 8826369 / Tim Madge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2824  Respondent: 8826369 / Tim Madge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/6093  Respondent: 8826913 / Gemma Harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a detrimental impact existing local communities by over development , particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. I do not believe the services in these villages will be able to cope.

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

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

---

**Comment ID:** pslp171/3123 **Respondent:** 8827777 / Mary English **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

---

**Comment ID:** PSLP16/2955 **Respondent:** 8827809 / Robert Wood **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development 'should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of 'sustainable development' is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long term impacts.

The policy states that it aims 'to secure development that secures the economic, social and environmental conditions in the area'. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as 'sustainable', in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy.

should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications ‘wherever possible’ and ‘without delay’ reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles.

These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:


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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S1 - Presumption in favour of sustainable development

OBJECT. The huge number of homes proposed takes insufficient account of transport and infrastructure problems which with the physical constraints are unsurmountable.

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/6145  
Respondent: 8830145 / Peter Smart  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Sites - S1

I OBJECT to the random Settlement Boundary which has been imposed on our village, East Clandon without any consultation of any kind or to explain the likely impact of such a boundary on this 900 year old village. As stated earlier Policy H3 proposes Rural Exception Homes could proliferate on the borders of this area which would not be appropriate for this conservation area.

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

Attached documents:

Comment ID: PSLPP16/3289  
Respondent: 8832513 / Richard Russell  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking" yet no definition of "sustainable development" is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as "sustainable", thereby failing to meet the NPPF's most important guideline.
POLICY S1: Presumption in favour of sustainable development

I **OBJECT** because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking” yet no definition of “sustainable development” is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as “sustainable”, thereby failing to meet the NPPF’s most important guideline.

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

Attached documents:
We consider that the Vision should be more strongly expressed to espouse this principle, rather than simply suggesting that existing brownfield sites are the "preferred location". We would therefore suggest, to ensure consistency with national policy and Plan soundness, that the following text (underlined) should be added to the third paragraph of the Spatial Vision as follows:

"The plan provides for the delivery of 13,860 additional homes by 2033. As the preferred location for this development is on existing brownfield sites in the urban areas, opportunities to maximise residential development and make best use of land in these locations must be taken. Over 2,800 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car..... "

We also note that the Vision recognises that the growth proposed in the plan is predicated on the delivery of the necessary infrastructure. The referenced Infrastructure Schedule contained at Appendix C specifically includes "Guildford rail station capacity and interchange improvements"; thus recognising that the station improvements proposed in Policy A7 (which SRG propose to bring forward), which form part of increasing passenger capacity at Guildford Station, also make an important contribution to providing the necessary infrastructure to support the planned growth.

By way of commentary, we would note that delivering the necessary infrastructure can also be predicated on ensuring that there is sufficient income producing residential and commercial development. NPPF recognises (para 173) that careful attention must be given in plan making and decision taking to scheme viability including where there are, as is the case at Guildford Station, contributions to infrastructure.

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

Attached documents:
While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

The policy states that development applications will be approved wherever possible regardless of sustainability. NPPF 14 notes that policies within the framework may require development to be restricted. The draft Plan should therefore not imply that development applications will be approved whatever their merits. Policy S1 fails to distinguish between presumption in favour of sustainable development and a presumption in favour of any development at all. Of the 12 core principles set out in NPPF 17, Policy 1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7052</th>
<th>Respondent: 8837313 / Maria Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport.

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16924</th>
<th>Respondent: 8837729 / Harry Clarke</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. Policy S1 – object
   1. The Local Plan is not sustainable beyond 2033, as there won’t be sufficient land available for further development in accordance with NPPF.
   2. Most of the area of Guildford Borough Council is covered by the Green Belt. The southern part is covered by the Area of Outstanding Natural Beauty, and the northern part is within 5km of a Special Protection Area. This provides very limited opportunities for development. The draft Local Plan, 2016 proposes increasing the number of houses built per year above current levels. This is not sustainable.

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

Attached documents:

---

Comment ID: PSLPP16/16211  
**Respondent:** 8839041 / Jon Maslin  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development ‘should be seen as a golden thread running through both plan-making and decision-taking.’ Policy S1 ought to set a clear framework. No definition of sustainable development’ is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise 'to secure development that secures the economic, social and environmental conditions in the area' omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as 'sustainable', thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications ‘wherever possible’ and ‘without delay’ reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3

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

Attached documents:

---

Comment ID: PSLPP16/13408  
**Respondent:** 8840033 / Jimmy Daboo  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

The A247 in West Clandon is already used by too many vehicles travelling too quickly and any additional traffic could make it dangerous. My daughter is an electric wheelchair user and often travels between our home and Clandon station. She says the road can be too busy to cross safely.

Similarly in peak times Guildford City Centre is too busy

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/13176   Respondent: 8840449 / David Wilson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1. Presumption in favour of sustainable development

1.1. I OBJECT

1.1.1. The Ministerial foreword to the NPFF defines sustainable as “ensuring that better lives for ourselves don’t mean worse lives for future generations”

1.1.2. It is clear that the proposed local plan will not make lives better for future generations, because the Green Belt area will firstly be reduced in size and secondly will be built upon. The Green Belt is there for a purpose and the Government’s Planning Guidance document para 81 states that “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. GBPSLP2016 is in contravention to this guidance.

1.1.3. The proposed developments in West Horsley are not sustainable. We have only one small shop which is shortly to close, and no post office!

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

Attached documents:

---

Comment ID: PSLPP16/18174   Respondent: 8843361 / Adrian Atkinson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area”. Reading this policy I imagine myself in the shoes of decision makers in the council and, quite frankly, it is worthless fluff. As a practical guide to the tough choices Councilors will face, it is
useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. This is also illustrated in the councils corporate strategy where “Green Belt” or “Greenbelt” is only used twice whereas economic or its variants has been used 10’s or hundreds of times. The Green Belt is a living example of sustainable development in practice. Within villages, development is happening despite the fact they are washed over. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. Set against this backdrop, there is a commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias and not a balanced view of sustainability. So in effect we have a presumption in favour of any development at all. This policy also ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:

Another problem is that you always think of big schemes to fit in with the ideas of big developers, whereas more housing could be found in much smaller schemes (just 2 or 3 houses) filling in where possible and also utilising unused brown field sites.

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

Attached documents:

NPPF 53 recommends “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

This plan contains no explicit direction for such “garden grabbing”, unless the Council is intentionally allowing this.

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

Attached documents:
We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/1490  
**Respondent:** 8850465 / Colin Chandler  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

> Comments on Proposed Submission Local Plan

> I wish to strongly object to Guildford Borough Councils (GBC) Draft local plan, which would see an increase in housing in Ockham and the Horsleys of approximately 77%, most of that development taking place on Greenbelt land.

> It is staggering to think that on the one hand, you pronounce GBC's policy to be the protection of the Metropolitan Green Belt, although the Housing policies that GBC have set out would see 65% of that development on Green belt. A massive contradiction indeed.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/13309  
**Respondent:** 8850945 / Richard Bayes  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1: Presumption in favour of sustainable development

I support the objective of favouring sustainable development as set out in Policy S1.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/7261  
**Respondent:** 8854273 / D.G. Peters  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I consider it is unacceptable that Guildford is choosing not to constrain its overall housing growth.

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

Attached documents:

Comment ID: pslp171/2808  Respondent: 8855649 / John Coleman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/10589  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17758  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to policy S1 as stated and the presumption in favour of sustainable development

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt]
surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment

- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserv heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan.

Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
5 POLICY S1 SUSTAINABLE DEVELOPMENT

5.1 I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” IE Blackwell Farm should be excluded.

5.2 I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

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

Attached documents:
I object to Policy S1 as the development proposed will not be sustainable.

In my view, Policy S1 ought to set a clear framework. Instead, there is no definition of “sustainable development”. The policy fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

As a business owner employing 30 staff in central Guildford, I welcome the aims of wishing “to secure development that secures the economic, social and environmental conditions in the area”.

Unfortunately I do not believe Policy S1 does this as there is a conflict between (i) economic growth and (ii) protection of the natural beauty (which combined with proximity to London) attracts many businesses to the locality. The policy does not say how each element is to be weighted or conflicts resolved.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. Guildford has been blessed with much Green Belt and yet there is no commitment to protect the Green Belt from inappropriate development.

The development of 13,860 homes during the Plan period is not sustainable as the infrastructure would not be able to cope. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

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

Attached documents:

Comment ID: PSLPP16/2203  Respondent: 8860897 / Julia Shaw  Agent:

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

I OBJECT to this policy.

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas".

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt]
surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment.

- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“...The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3]. In my view this is a non-policy.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

2. I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

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

Attached documents:

Comment ID: PSLPP16/10240  Respondent: 8862465 / Nik Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: PSLPP16/11362  Respondent: 8865537 / P Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”.

Attached documents:
This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2893</th>
<th>Respondent: 8865537 / P Waldner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
</tbody>
</table>
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/14840   Respondent: 8865985 / Grant Ringshaw   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact to existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles putting even greater pressure on the road infrastructure. These sites are just unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3027   Respondent: 8865985 / Grant Ringshaw   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/1346  Respondent: 8875233 / Richard Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: pslp171/3045  Respondent: 8875329 / Katherine Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

**Comment ID:** PSLPP16/2337  **Respondent:** 8876673 / Tony Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I am writing to comment on the revised local plan which has been issued for consultation. I will comment specifically on a certain number of Policies but I OBJECT overall to a plan which is based on unsubstantiated data as to the number of dwellings needed and which on the vital issue of infrastructure offers nothing but pious hopes

Policy S1 Presumption in favour of sustainable development

I OBJECT that although this appears to be based on the NPPF it fails to give a guide to the resolution of inherent conflicts between economic growth, social justice and environmental protection. In particular it fails to recognise that development in rural areas with inadequate infrastructure (especially transport) is unsustainable

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

Attached documents:

---

**Comment ID:** PSLPP16/15581  **Respondent:** 8880321 / Elizabeth Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object.

The proposed development as detailed in the Local Plan is not sustainable

13,860 new houses is a huge number and is neither appropriate nor sustainable. A number of established villages around Guildford would be changed beyond recognition and the planned misuse of existing Green Belt land is unacceptable.

More of the large scale development should be planned in urban areas where there an existing transport network.

If the local plan is adopted, my village West Horsley would be increased in size by 40% within 3-5 years. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

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

Comment ID: PSLPP16/7152  Respondent: 8881345 / Lynne Ground  Agent:
Document:       Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/11567  Respondent: 8881537 / Jean Baptist  Agent:
Document:       Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3328</th>
<th>Respondent:</th>
<th>8883489 / N &amp; B Hinchliff</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

2. Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The development should be in urban areas where there is sustainable transport. West
Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5740</th>
<th>Respondent: 8883841 / Pamela French</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16611</th>
<th>Respondent: 8883841 / Pamela French</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
**Comment ID:** PSLPP16/3290  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**  

I **OBJECT** because the NPPF (Paragraph 14) states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking" yet no definition of "sustainable development" is contained within the Draft Local Plan which, by inference, suggest that any future development will seemingly qualify as "sustainable", thereby failing to meet the NPPF’s most important guideline.

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

Attached documents:
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently damage and will have lasting detrimental impact to all the existing local communities by ‘over development’, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The local services and infrastructure in these villages will be unable to cope with the level of development proposed. The proposed developments as they stand do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in completely unsustainable locations. They do not benefit from railway stations within easy walking distance, furthermore with the reduction of bus services across rural villages, this will force more motor vehicles to what is already congested roads. These sites are unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve wider infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

With the proposed development coming within 400m of my property, I am acutely aware of the destruction, the increased noise, pollution and damage this development will have to the local habitat. This will perhaps, affect me more than most but all residents in Send, Clandon and Ripley will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/9251  Respondent: 8892737 / David Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”; in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3072  Respondent: 8892737 / David Eagle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl! Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8470</th>
<th>Respondent: 8893057 / Dianne Garnett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Legally Compliant?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1 Sustainable Development policy

I Object to this as the policy does not take into account that in rural areas infrastructure and transport cannot cope with the SCALE of the development proposed.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16960</th>
<th>Respondent: 8893057 / Dianne Garnett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Legally Compliant?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. **We object** to policy S1 as stated and the presumption in favour of sustainable development.

1.2 The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

1.3 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

1.4 The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

1.5 The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

1.6 The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

1.7 This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12135</th>
<th>Respondent: 8896097 / Andrew Fordham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Legally Compliant?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

**Policy S1. Presumption in favour of sustainable development**

I OBJECT

The NPFF defines sustainable as “ensuring that better lives for ourselves don’t mean worse lives for future generations”

I object as it is clear that the proposed local plan will not make lives better for future generations, because the Green Belt area will firstly be reduced in size and secondly will be built on. The Green Belt is there for a purpose and the Government’s Planning Guidance document para 81 states that “local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. GBPSLP2016 is in contravention to this guidance.

The proposed developments in West Horsley are not sustainable. We have only one small shop which is shortly to close, and no post office!

Proposed developments have a negative effect for future generations in that they will be deprived of Green Belt. I object.

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

Attached documents:

---

**The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”**

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4421</th>
<th>Respondent: 8897377 / Jan Jewers</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

9. I object to the Local Plan because the developments proposed are not sustainable (Policy S1)

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

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13606</th>
<th>Respondent: 8899617 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development and we do not think the scale and location of proposed developments are sustainable. Some 13,860 additional homes during the Plan period will have a permanently detrimental impact on existing local communities by over development, particularly for the villages of Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. Indeed parking in Ripley is already impossible and air pollution in the High Street at dangerous levels.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They have no ready access to railway stations and bus services across rural villages are being reduced. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan.

We urge the Council to give greater consideration to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion particularly at rush hour. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8028</th>
<th>Respondent: 8899713 / Tessa Crago</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are urban sprawl. Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/4245  Respondent: 8900705 / Susan Fuller  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development—My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1) The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

**Comment ID:** PSLPP16/8146  **Respondent:** 8902465 / Linda Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.

- No reference to most of the NPPF Core Planning Principles.

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

Attached documents:

**Comment ID:** PSLPP16/18518  **Respondent:** 8903265 / Susan Anderson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3088</th>
<th>Respondent:</th>
<th>8903265 / Susan Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>()</td>
<td>is Sound?</td>
<td>()</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15008</th>
<th>Respondent:</th>
<th>8904129 / Elizabeth Ross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/4180  **Respondent:** 8904673 / Colin Burnside **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3097  Respondent: 8906305 / Anne Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/18410  Respondent: 8909761 / Diana Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11203</th>
<th>Respondent: 8910145 / Mr G.W. &amp; Mrs A.C. Spratt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over development, particularly in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. It is patently clear that the road and train network will not be able to cope with such an increase in usage and will lead to hazardous conditions for all.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the The National Planning Policy Framework (NPPF).

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

Attached documents:

As stated above, West Horsley has been allocated 384 new houses. In West Horsley there is one small shop near the A246 and no Post Office. Transport links are limited and the railway is located at East Horsley. Most of West Horsley therefore relies heavily on East Horsley for shopping and public transport in the form of trains, which means that access is via East Lane.

The Local Plan imposes a far greater percentage volume of new housing in West Horsley than on other villages in the Borough or even within Guildford itself and provides no justification for this. New housing density proposed in West Horsley is much higher than elsewhere in the village and will therefore be wholly out of character with what exists now.

The extra population will impose a further burden on existing services and amenities making them less accessible and more difficult to use. The roads in the two Horsley parishes do not have the capacity to carry a greatly increased number of vehicles, for which one must assume an average of two cars per new house. The Street and East Lane provide the main access from West Horsley to East Horsley and the junction with Ockham Road North is already clogged at peak times, especially in school term times. The developments proposed can only exacerbate these volumes of traffic and increase the times of day when this junction becomes ever more difficult.

In addition, there is one proposed site for development in East Horsley but on the boundary with West Horsley to which 100 houses have been allocated. Access appears to be from the Ockham Road just by the railway bridge at a wholly unsuitable point on the road and the traffic from this must also affect West Horsley in a major way. Another proposal in the local Plan retaining the site at the former Wisley Airfield just up the road at Ockham for a huge development of over 2000 houses will have, if ever realised, knock on effects on sustainability across the Horsleys.

The Strategic Housing Market Assessment from which housing numbers are generated derive from a mathematical model devised by consultants, the basis of which has not even been disclosed to the Borough Council and is not explained in the Plan or supporting documents. The actual housing target is even higher and the Borough Council projects a population increase 70% higher than the official national estimate for the Borough. This clearly does not make sense and must be explained. Why can we not know the methodology behind the mathematical model?

West Horsley Parish Council with Surrey Community Action Housing carried out a survey of housing need in 2014 and identified a need for 20 affordable homes for local people who want to stay in the village. What guarantee is there that, if
any housing is built in either of the Horsleys in accordance with the Local Plan proposals, it will be of the kind actually required or desired by the villages?

I object to the lack of provision for sustainability in the Local Plan in practically all its aspects as they affect the Horsleys.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/12050  **Respondent:** 8914945 / Nichola Armstrong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

**Policy S1** is clearly pro development and the main thrust of GBC’s Local Plan. 693 dwellings proposed per year is ‘unsustainable’. It does not protect the greenbelt but instead proposes inappropriate development such as ‘strategic site’ A46 Normandy and Flexford, a site within two settlements, destroying the rural character of the area and the extinction of Flexford. GBC has made unsubstantiated claims that the overwhelming development of A46 will lead to an improvement in ‘sustainability’. GBC’s own data is confused, in the first consultation Normandy is treated as one settlement, in other data Normandy and Flexford are treated as two settlements. Planning Policy, not the residents of Normandy and Flexford have decided it will be treated as two settlements and by joining the two settlements together by an overwhelming development (715 homes, 385 flats, 1,500 place secondary school, a Primary School for 420 pupils, a residential or care home, a parade of shops and the Borough’s allocation of 6 showman pitches, an additional 8 flats by the station, 8 flats replacing the two homes in Glaziers Lane that will create a new access to A46 ) it will be sustainable. No it will not because there is no infrastructure. However, according to Policy S1 lack of infrastructure does not matter because it states, development applications will be approved regardless of sustainability.

This development does not reflect the ‘needs’ of the residents who live in Normandy and Flexford. This is clearly a profit making, developer led proposal (submitted on behalf of Taylor Wimpey 2 years ago to Planning). Core principals in the NPPF state “empowering local people to shape their surroundings… take account of the character of different areas… protecting the Green Belts around them… recognising the intrinsic character and beauty of the countryside”. These core principals have been ignored.

The NPPF 155 states, ‘early and meaningful’ engagement and collaboration with neighbourhoods, local organisations is essential’. No ‘meaningful engagement’ has been extended by Guildford Policy to residents who have chosen to live in a rural community will be seriously affected by A46. **I strongly object to Policy S1.**

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

**Attached documents:**

---

**Comment ID:** pslp171/3100  **Respondent:** 8916929 / Gillian McWilliams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/9520  Respondent: 8918657 / Tim Handley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Objection to Policy S1 – Objection to GBC’s plans for “Sustainable Development” within East & West Horsley and Ockham / Wisley Airfield

I object to the proposed development of so many new homes within East / West Horsley and Ockham – the proposals are not sustainable and will damage the character and amenity of the villages. The facilities in the villages are limited and not extendable. Local schools and medical practice are already over subscribed and the train station car parks at Horsley and Effingham Junction are full to capacity, with no room for expansion. In summary the proposals to build such a huge number of new homes are unsustainable in terms of schooling, drainage, roads capacity, shops and parking in East Horsley (shops and station) and public transport – with limited capacity for busses on narrow roads.

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

Attached documents:

---

Comment ID: PSLPP16/13192  Respondent: 8919009 / Andrew Kukielka  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/3519  Respondent: 8919521 / Susan Hughes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICY S1 – Presumption in favour of sustainable development OBJECT. While I support the idea of sustainable development, the policy does not recognise the specific nature of rural areas, where inadequate transport and other infrastructure such as schools and medical services cannot cope with the proposed scale of development. Building new houses on the scale proposed is not sustainable development - it is unsustainable.

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

Attached documents:

Comment ID: pslp171/2898  Respondent: 8921281 / Ian Cooper  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitations Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/11977  Respondent: 8921377 / Paul Maycox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/13001  Respondent: 8921569 / Steven Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the Local Plan on the grounds that the proposed development will be unsustainable (Policy S1)

National Planning Policy states that the purpose of the planning system is to contribute to the achievement of sustainable development.

Development of 13,860 homes during the Plan period is unsustainable. Ripley and surrounding villages will be adversely impacted – with such impact being irreversible. The proposed developments are not what is needed by the communities of Ripley and surrounding villages and services in these villages will not be able to cope with the extra demand inherent in the level of development proposed.

Wisley Airfield (A35) and Garlick’s Arch (A43) are not suitable or sustainable locations for development. They are far distant from the nearest railway station and have very poor and decreasing bus services. Residents of these developments will inevitably have to use private motor vehicles for almost all of their transport needs, further clogging up local roads, the A3 and M25 and causing additional air pollution. Ripley in particular already suffers significant traffic congestion and additional development will simply add to the current gridlock.

I note with regret that there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan.

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

Attached documents:

Comment ID: PSLPP16/13191  Respondent: 8921857 / Claire Kukielka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.
I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick's Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create 3 'new towns' of approx. 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes on-site, as does Dickens Heath, Solihull, on which the GBC Pegasus report was based.

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

Attached documents:

Comment ID: PSLPP16/11699  Respondent: 8928033 / P. Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

The services in these villages will be unable to cope with the level of development proposed.

The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/11924  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
1. STRATEGIC POLICIES

This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4450</th>
<th>Respondent: 8930209 / Ray Corstin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/17700  Respondent: 8930305 / Elaine Best  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to Policy S1: presumption in favour of sustainable development. Your proposals contradict key sections in the National Policy Planning framework and are non-compliant with such sections as 7, 10 and 17.

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

Attached documents:

---

Comment ID: PSLPP16/5447  Respondent: 8930465 / Michael & Carol Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I strongly object to the Local Plan. There is no evidence to suggest we need in excess of 13,000 houses in the area. This level of development is not sustainable and the National Planning Policy promotes sustainable development.
The Local Plan is flawed and has been prepared in a biased way, with a huge amount of the development being recommended around the Clandons.

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

Attached documents:

Comment ID: PSLPP16/5458  Respondent: 8930465 / Michael & Carol Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non bias report.

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

Attached documents:

Comment ID: pslp171/2918  Respondent: 8930465 / Michael & Carol Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/12629  Respondent: 8931233 / John Pemberton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the developments proposed as they are not sustainable. The total of the strategic sites (A43,A25,A35 & Upshott Lane in Woking) will concentrate development along the A3 corridor. 5000+

Houses, 11,000+people &10,000 cars. The A3/M25 junction already tails back daily. The Highways Agency faces an impossible task.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/7568  **Respondent:** 8933793 / Sally Novell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I OBJECT to Policy S1 which doesn’t offer sustainable development as regards roads and rail infrastructure. The current road network doesn’t cope with existing demand, with frequent congestion on the M25 and A3 in particular, and the trains are already overcrowded. No pre-emptive planning has been made to alleviate these problems which will be much exacerbated by large increases in housing in the north-east of the borough. I am particularly concerned about the impact of additional traffic on narrow winding local roads such as the A247 through West Clandon and the Ripley Road in East Clandon, which is already used as a cut-through to and from the A3. This would be much exacerbated by the proposed huge housing developments in the area which would inevitably result in a large increase in cars and travel.

2. I OBJECT that Policy S1 (Presumption in favour of Sustainable Development) is not being met as there are no fixed plans to improve the provision of shops, medical facilities, schools in the area. The infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope;

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

Attached documents:

---

**Comment ID:** PSLPP16/13271  **Respondent:** 8933953 / Stephanie Billington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I am saddened to be writing to you for the third time to object to a Local Plan which in spite of unprecedented thousands of objections has not been altered in any material way to reflect the wishes of local people. There has been no meaningful consultation in any ordinary accepted sense of the word of listening and taking heed of views. As the Plan is so little altered all the previous letters of objection still apply and it is immoral on the part of Guildford Borough Council (GBC) to state that they will not do so. I suspect that many local people will be too disillusioned to bother to write yet again. For these and other reasons stated in my letters of 29th November 2013 and 21 September 2014, which I wish to apply to this stage of the consultation as well, the consultation process has not been a fair process.

I will refer in my letter to Policies in the Plan to which I have particular objections. Many however are too complex or obscure for me to be able to comment in detail. However, as detailed below, I believe that GBC’s Local Plan needs to have the defining Green Belt characteristic of the Borough at its heart and until it does so, the Plan is fundamentally flawed and I object to it in total.

GBC has shown no exceptional circumstances for changing the Green Belt boundaries to remove 14 villages from the Green Belt, extending the size of those villages in the process. The Plan is therefore contrary to the NPPF

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

Attached documents:
I strongly object to many of the proposals in the 2016 redraft of the Guildford Local Plan, as set out in my detailed comments attached below.

The draft Plan proposes serious - and in my view unnecessary - erosion of the Green Belt and major new housebuilding, both in East or West Horsley and in other rural places in Guildford Borough. I object both to the numbers of new houses proposed in the Plan, and to the proposed locations for building them.

It appears that in preparing the revised Plan the Borough has taken insufficient notice of the very large number of objections and other comments received after the last round of consultation. Like their predecessors, the new proposals are badly thought out and are arousing a very high degree of local protest. Planners and councillors should remember their duty to existing residents, and resist the trend to over-development to maximise short term financial gain.

The Council has just insulted our intelligence by describing (in its news sheet “About Guildford”) the revised proposals as “A Local Plan for Local People”. This is rubbish; made worse by an outright lie that the revision has taken on board residents’ comments on the previous draft. The reality is that little or no account seems to have been taken of the great weight of public objections to the earlier proposals, which are little changed - and in the overall scale of housebuilding envisaged, have actually been changed in the wrong direction. The vast majority of local people’s lives will be made much worse by the scale of building (on green belt, too) envisaged in the document. The only people to benefit from the proposals would be a handful of developers, those with land to sell to them, and their friends on the council.

For the whole Borough, the number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan. These numbers are hugely excessive, but it is even more objectionable that over 60% of the new houses in the Borough are proposed to be built on land that is currently in the Green Belt.

At my more local level the new proposals include at least 148 more houses in East Horsley; at least 385 more houses in West Horsley; and that both villages would be taken out of the Green Belt. I object to these proposals. They would totally and unacceptably change the unique character of our villages, especially as the Plan also envisages the building of many more houses nearby: 2068 on the former Wisley Airfield; 400 more at Burnt Common; and 2000 at Gosden Hill Farm. None of these places is more than a few miles away from the Horsleys. It is likely the new houses will average more than one car per household, so the plan would result in several thousand more cars in use within a three mile radius of the villages. The impact on local roads would be tremendous. Parking spaces at Horsley & Effingham Junction stations (which are already full), at the shops, at the medical centre and at the village hall would all be grossly over-subscribed. Road congestion (especially at commuting and school pick-up times) would change from the present situation of everyday but manageable small delays into one of traffic jams and long periods of no movement.

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

Attached documents:
I am hugely disappointed with the content of Guildford Borough Council's 2016 Local Plan. Sadly there is very little to applaud. In 2013 & 2014 GBC underwent time consuming and expensive consultation processes; GBC were deluged with comments and suggestions on both occasions. Did they listen? It appears not I do hope GBC will listen to the electorate this time!

Policy SI: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

The Plan sets out a wish to comply with the NPPF's notion of sustainable development. This is an excellent aspiration. However I am sorry to say that I doubt whether the principles of sustainable development can be met by this plan. I cannot see there is much scope here for securing development that satisfies the 'three dimensions' in sustainable development as set out by the NPPF - the economic, social and environmental conditions in the area are not likely to be enhanced! The Plan overburdens parts of the borough with development in ways that will make it extremely difficult for the communities to function let alone find improvement.

* Therefore I applaud the idea of sustainable development but think that in many areas this plan will fall short.

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

Attached documents:

Comment ID: pslp171/2970  Respondent: 8939425 / Petria Hiam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/17106  Respondent: 8940225 / Glen Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy SI)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

1. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.
I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

Comment ID: PSLPP16/9362  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. The policy defines sustainable development in such general terms that it would be useless in guiding local planning decisions in any consistent or meaningful way.

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

Attached documents:

Comment ID: PSLPP16/16149  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. The policy defines sustainable development in such general terms that it would be useless in guiding local planning decisions in any consistent or meaningful way.

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

Attached documents:

Comment ID: PSLPP16/12774  Respondent: 8949569 / Richard Deighton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Failure to Define ‘Sustainable Development’

The Local Plan does not define anywhere what it means by ‘sustainable development’. The Plan therefore contains no guidance to planners or developers as to what is required, and ‘sustainable development’ has therefore become no more than a catchphrase that means what anyone wants it to mean.

The Local Plan needs instead to highlight exactly what the NPPF regards as ‘sustainable development’ and this should include objective criteria by which the sustainability or otherwise of a proposed development can be assessed, and any resulting detriment to existing communities quantified. Sustainability should also have regard to supply-side capacity as discussed above.

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

Attached documents:

The University supports the clear presumption in favour of sustainable development in line with guidance in the National Planning Policy Framework (NPPF).

Part of the accepted view of sustainable development is that it provides a better living environment; it also has a strong economic component that provides employment; and it helps create social cohesion.

The economic component of this in an increasingly competitive global economy is critical in achieving this form of development, alongside the environmental and social goals.

There is widespread acceptance and clear evidence that universities play a major role in supporting innovation and competitiveness in the UK. In addition to delivering outstanding research and teaching, universities interact with all the stakeholders in the economy and there is evidence that demonstrates the positive contribution that they make to the UK’s economic and social development. In the case of the University the leverage it brings to the UK economy in Gross Value Added terms is seven times its income each year. This is particularly high for the sector and supports the vitality of Guildford and the region.

Based on this evidence, what has been described as a triple helix model of economic development has now become widely adopted. This model involves collaboration between businesses, government and universities but also requires some crossover of their roles, with universities taking a more commercial role in developing ideas, government facilitating with funding and business committing more resources to research and development.

Much of government policy since 1997 at a national and European level has focused on this three way relationship. Under the regime of Regional Development Agencies (RDAs) universities in the UK were required to extend their role from teaching and research to include community development. Thist was funded through a number of initiatives, of which some remain in place. This relationship remains as a key driver and was set out in the government report "No Stone Unturned" and is also influencing the funding activities of the Local Enterprise Partnerships (LEPs). The former government also established its own National Innovation Agency (Technology Strategy Board) and at a European level the Horizon 2020 programme again reflects the importance of innovation.

What has also been recognised since the early part of the 21st Century is the need to accelerate the process of innovation through what has become known as open innovation or co-creation, which relies on talent and skills and has resulted in a focus on the role of creative young people.
The University of Surrey has been and continues to be closely involved in all aspects of these policy-led models of innovation, and today is responding to the challenge of supporting the open innovation model.

To continue to be effective as a stakeholder in the relationship with government and business in order to support the open innovation model, the University has recognised the need to be able to attract to and retain in Guildford the necessary people with the necessary skills and talent to support its evolving role.

The plans for the development of Blackwell Farm include provision of employment land near to the economic drivers of the University of Surrey, the Surrey Research Park and the Royal Surrey County Hospital. They will also locate new homes close to existing and proposed employment, providing the opportunity for workers to live closer to their place of work.

Despite the high gross value added of Universities (Surrey provides £6.90 of GVA to the UK for every £1 income it receives), the economic fundamentals are difficult. In order to maintain their estates and to generate cash for reinvestment a typical University would need, in the current funding regime, to generate surpluses of around 5% to 7% per annum. Few research-intensive science based Universities do this, and Surrey is no exception.

The plans for Blackwell Farm will provide the University with resources for re-investment in its activities in Guildford, helping to cement its position and secure its future. This in turn will benefit the town and the borough.

**Paragraph 4.1.6**

The University supports the stated preference to focus development in the most sustainable locations and to make the best use of previously developed land. However, whilst the use of previously developed land in the main urban areas is supported, the University would note that all previously developed land in the borough is not necessarily in the most sustainable locations. A change to the text is therefore suggested as detailed below.

It is important to protect the environment within our urban areas from over development that could affect quality of life and that could adversely affect the attractiveness and amenity of the urban environment.

Development that is on sites that are remote from the main urban areas, even if it uses previously developed land, is often less sustainable than greenfield locations on the edge of town and close to existing services and facilities. This is because development in locations that are relatively remote from the main employment and service centres at the main urban areas provides little alternative other than the use of the private car to gain access to jobs, schools and other services.

Depending on the specific circumstances and context, development in such relatively remote locations is therefore often less sustainable than similar development on greenfield sites on the edge of the main urban areas, since these often have a far greater ability to provide good alternatives to use of the private car.

Taking into account the imperative for residents at relatively remote sites to use private cars rather than having the opportunity to walk, cycle or use public transport, there are implications in terms of use of resources, carbon balance and related environmental and social impacts that have to be considered. These include increased congestion on roads, increased vehicle emissions, the time spent and cost of commuting, and the effect this can have on household budgets and on general health and well being.

There is therefore a question mark around the idea that inset villages and other identified villages are of equivalent status as sustainable locations to Guildford urban area, even if there is previously developed land that has potential to be used for new homes.

There will of course be circumstances where some limited amount of development in the villages in the borough may be necessary to sustain existing services and facilities that may be at the margins of viability, and in some cases there may be viable public transport options for travel. In these circumstances previously developed sites should of course be used where suitable and available. It is also apparent that smaller sites are needed as well as larger ones to keep a supply of homes coming forward.

Nevertheless the list of sustainable locations in the paragraph should include urban extensions to Guildford.
This is because the town of Guildford is by far the largest settlement in the borough, where the majority of people live. It is the economic powerhouse of the borough, and indeed a wider area beyond the borough boundaries. It is the focus for employment, services, retail and other facilities for a wide catchment. Extension of the town’s boundaries to allow more new homes and employment land to integrate with the existing town is a more sustainable approach than pushing new homes to locations away from the town, even if these may be previously developed sites.

Paragraph 4.1.6 should be reworded to read:

“Our preference is to focus growth in the most sustainable locations, including both making the best use of previously developed land and land that is well located in relation to existing services and facilities. These locations are:

- Guildford town centre
- Urban areas
- Urban extensions
- Inset villages
- Identified green belt villages.”

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7307</th>
<th>Respondent: 8971233 / Tim J. Harrold</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1: Presumption in favour of sustainable development

CPRE finds the wording of this strategic policy inadequate. There is no attempt to define what the word "sustainable" means. It does not provide guidance as to how the conflicting requirements of economic, social and environmental conditions can be balanced or met. All the emphasis is given to the need for planning decisions to be flexible, adaptable to rapid change, and positive to development. The existing wording adds little more of importance than what is already contained in the NPPF. We consider a major omission is that there is no reference to the Green Belt or to its importance. There is no indication that a whole chapter in the NPPF is concerned with protecting Green Belt land. There is a failure to explain Paragraph 14 on page 4 with its important footnotes which relate to the specific policies in the NPPF which "Indicate development should be restricted" and that prompt decision-taking should be made "unless material considerations indicate otherwise". There is no reference to Paragraph 115 on page 26 which includes the statement that great weight should be given to conserving landscape and scenic quality in Areas of Outstanding Natural Beauty (AONB) which have the highest status of protection. How can this be right in a Borough where so much land falls within the Green Belt and the Surrey Hills AONBI. Paragraph 119 is also disregarded with its statement that "the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring assessment under the Birds or Habitats Directives, is being considered, planned or determined“. Guildford surely needs to recognise this strategic policy in view of its close proximity to the Thames Basin Heaths.

The policies referred to in Footnote 9 on page 4 of the NPPF are all highly relevant to Guildford Borough and should therefore be given prominence. They need to be clearly referenced in this important Strategic Policy so that their relevance and significance is acknowledged and properly recognised. So many planning decisions in our borough have to be concerned with the Thames Basin Heaths SPA, SSSIs, the Surrey Hills AONB, the Green Belt, Local Green Space, heritage assets and locations at risk of flooding. We are critical of the way in which these constraints have been handled in the preparation of the draft plan. They need to be clearly spelt out from the outset for all to see.
It is surprising that the strategic issue of infrastructure provision of all types has not been more adequately covered. The extensive proposals for building on the Green Belt will be unsustainable without further input from Highways England and Network Rail. CPRE OBJECTION.

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

Attached documents:

---

Comment ID: PSLPP16/14021  Respondent: 8974177 / Nigel Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Support

However the Developer needs to both theoretically and physically prove that any development is sustainable. The developer should not be allowed to pass over the operational use of the development to the end users and then walk away. A Planning Condition should be added to any approval that the developer must collect data for a period of no less than 5 years to prove the sustainable credentials of the development. If this data does not demonstrate the proposed benefits then the developer should be required at his own cost to introduce additional measures to meet their proposals. By use of this planning condition the developer will be seen to be engaging with the community.

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

Attached documents:

---

Comment ID: PSLPP16/11962  Respondent: 8979265 / Rachel Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

---

Comment ID: PSLPP16/13125  Respondent: 8993121 / Shelagh Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S1: Presumption in favour of sustainable development

I OBJECT to this policy.

This policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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

Attached documents:

Comment ID: PSLPP16/51  Respondent: 9002593 / Brett and Susan Whitby-Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

As a long term resident of Normandy my comments are going to be about the local plan as it affects this area.

Under the proposed development in the local plan Normandy & Flexford effectively cease to exist as what is proposed is basically a new town swamping the existing villages.

This is clearly a disproportionate level of development.

Sustainability versus Sensitivity, the local plan picks and chooses whether to separate Flexford and Normandy or separate Flexford and Normandy to try and justify the plan. Clearly this is not appropriate

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

Attached documents:

Comment ID: PSLPP16/8662  Respondent: 9050337 / Nigel Geary  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

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

Attached documents:

Comment ID: PSLPP16/952  Respondent: 9052129 / Sue Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
But I digress and will now continue with my objections relating purely to West Horsley and the erosion of the Green Belt.

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

- The proposed development of 385 homes – a increase of 35% of housing - at much higher densities than currently exist in the village settlement would be out of character with the existing mix, the layout of the village, it’s also unsuitable because of:

  Drainage - in Green Lane when it rains the manhole covers lift up and the storm drain flood the lane, walking along the Ockham Road North is dreadful after rainfall.

  Schools – the Raleigh is always full and is once again over-subscribed (the last new neighbours couldn’t get a place for their youngest child and I gather there are 23 others also waiting)

  There is an infrequent bus service in West Horsley (weekdays only) and should these additional people choose to travel by train and drive to Horsley Station, there is little parking there.

  There is one greengrocer and NO post office in West Horsley, with about 4 parking spaces for these.

  The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

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

Attached documents:

Comment ID: PSLPP16/11423  Respondent: 9062913 / Susan Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S1 – Presumption in favour of sustainable development

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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

Attached documents:

Comment ID: pslp171/1838  Respondent: 9062913 / Susan Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into practice in forming this plan.

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

Attached documents:

---

Comment ID: PSLPP16/6981   Respondent: 9094753 / D Jones   Agent:

Document:   Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/4474  Respondent: 9298465 / Peter Grover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This
Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running
through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying
sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in
the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The
policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as
“sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development and that level of constraint should be spelled out.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10743</th>
<th>Respondent: 9334785 / Carol Cook</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non bias report. (Policy S1)

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10630</th>
<th>Respondent: 9335041 / David Reeve</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1.1 Policy S1: Presumption in Favour of Sustainable Development

I OBJECT that the current draft is highly selective in its adoption of the principles of NPPF, in particular the following:

- The NPPF Ministerial foreword states that “‘Sustainable’ means ensuring that better lives for ourselves don’t mean worse lives for future generations.”
- The foreword also states: “Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. This should be a collective enterprise…. In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities. This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, we are allowing people and communities back into planning.
- Paragraph 155 states “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The current Plan has been constructed with remarkably little involvement of residents; certainly there has been no sign of “early and meaningful engagement and collaboration”; on the contrary, the experience of residents has been that the evidence base documents and plans have been developed in isolation behind closed doors, and then pitched into the public domain in the form of multiple large impenetrable documents. To add insult to injury, the Council has then fought a consistent rearguard campaign to defend many of the evidence documents against serious and well-argued criticism from residents.
I OBJECT that NPPF paragraphs 87 and 88 seem to have been discounted. They state that “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”, and that “‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”.

Ministerial guidance published by Brandon Lewis MP and Nick Boles MP on 17th January 2014 and 18th June 2014 makes it clear that unmet housing need alone is unlikely to qualify as “exceptional circumstances” and, further, that Greenbelt and AONB can be reasons for not meeting objectively assessed housing need. I OBJECT that this guidance seems to have been ignored.

I OBJECT that the scale of development that is proposed is anything but sustainable – it involves disproportionate development of villages (35% in the case of West Horsley); the extraction of large swathes of land from the Green Belt (about 7% of Guildford’s Green Belt being removed at a stroke); with two thirds of the proposed housing destined to be on land that is currently in the Green Belt. Proceeding at that rate would rapidly destroy all of the non-AONB Green Belt in the borough, and with it the important protections to the countryside along the A3/A31 corridor. The five purpose of the Green Belt as defined in NPPF are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

All these would be under threat if the current Plan goes ahead.

I OBJECT that the following extract from NPPF paragraph 14 has been ignored (my underlining):

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. ... For decision-taking this means (unless material considerations indicate otherwise):

- …
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless ... specific policies in this Framework indicate development should be restricted. (For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.)”

This paragraph gives an explicit statement that the default position is to grant permission but not for Green Belt land.

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

Attached documents:
I very much support the principle of a sustainable development policy generally, and in West Horsley specifically, which would assist in addressing my concerns for this village in particular as stated above. Key to this is “to secure development that improves the economic, social and environmental conditions in the area”.

My present perception, however, is that the allocation of some 5 key sites for a substantial quantity of new housing within the village, without the attendant proposals for such as community needs, facilities and infrastructure to serve what will be a substantially increased population, would thus over-burden those facilities which do remain and place yet more reliance on the neighbouring village of East Horsley.

There is undoubtedly, in my view, a critical need to look at West Horsley as an inset village as being a place in design and townscape terms, bearing in mind the developments proposed.

The following sections in this consultation response attempt to potentially address these issues with some positive suggestions.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
Comment ID: PSLPP16/15099  Respondent: 10326081 / Ian Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Under this broad policy, any development will be classed as “sustainable”, totally ignoring the NPPF’s guidance on the fundamental need to preserve the green belt boundaries.

The Green Belt forms 89% of the borough and really should be established as one of the primary aims of the policy. Most of the land area is green belt and there needs to be a reference to how the Council intends to implement planning policy in this highly relevant context. Policy S1 needs to state that it will maintain and protect the existing Green Belt.

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

Attached documents:

Comment ID: PSLPP16/2291  Respondent: 10423265 / Jillian Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds/ …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:

Comment ID: PSLPP16/13175  Respondent: 10430401 / St John the Evangelist (Mark Woodward)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT TO the local plan as the development proposed is not sustainable. (POLICY S1) • No guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy and no commitment to protecting it.

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

Comment ID: pslp171/2869  Respondent: 10551937 / Anne Davies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp171/2832  Respondent: 10570977 / Laura Richards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/6757  Respondent: 10616193 / Kate Mumford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the assumption that housing is needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
enjoy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view this is a non-policy NPPF paragraph 14.

The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

Including: “empowering local people to shape their surroundings... Take account of the different roles and character of different areas... protecting the Green Belts around them... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future... Contribute to conserving and enhancing the natural environment and reducing pollution... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”

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

Attached documents:

Comment ID: PSLPP16/4523  Respondent: 10667073 / Trudi Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** pslp171/3086  **Respondent:** 10667073 / Trudi Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

### E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

---

### I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport.

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2905  Respondent: 10672417 / Matthew Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/13748  Respondent: 10682529 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

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

Attached documents:

Comment ID: PSLPP16/13438  Respondent: 10701537 / Ben Gamble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by the National Planning Policy Framework.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25,
including Ripley, Send and Clandon. The services in these villages, including schools and doctors, will be unable to cope with the level of development proposed.

The sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the narrow roads serving the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: pslp171/3021  Respondent: 10703745 / Frank Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/1492  Respondent: 10717985 / Alison Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the lack of clear definitions and clarity running throughout this section. There is no clarity, no clear framework proposed to enable complex and critically important decisions to be considered and decided upon. Thus this section is not a policy but a thinly veiled justification for promoting excessive and unwarranted development in the borough.
I object to GBC stating: the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

'Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; GBC has received much evidence that decisions to move villages out of the Green Belt and to build on Green Belt land will not be advantageous, nor provide benefits.

I object to the fact that whilst the NPPF states that the presumption is not to build on Green Belt unless exceptional circumstances are provided to warrant this, GBC fails to do this. What is exceptional is GBC persisting with this proposal in the face of so much local opposition and without providing good evidence for their proposals.

I object to the favour and bias that GBC shows towards development - evidenced by their use of phrases such as 'without delay'.

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

Attached documents:

---

Comment ID: PSSLPP16/17905  Respondent: 10722049 / Richard Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many respects, unnecessary. I request that my comments are shown to the Planning Inspector. I also request confirmation of receipt of these objections from Guildford Borough Council.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed is not sustainable (Policy S1). In this respect, it is a requirement of the National Planning Policy Framework that Local Planning Authorities should underpin their proposals with sustainable development.

The development of 13,860 homes during the Plan period is not achievable without significant damage to the environment; removal of land from the Greenbelt; increased pollution and a massive investment in the road system to enable through traffic to bypass Guildford Town. As presently drafted the Plan is not sustainable.

The Local Plan will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services, roads and facilities in these villages will be unable to cope with the level of development proposed.

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

Attached documents:

---

Comment ID: PSSLPP16/11702  Respondent: 10723553 / Judith Pound  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the local plan as the development proposed is not sustainable (Policy S1) – The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

---

Comment ID: PSLPP16/4763   Respondent: 10725729 / Annie Hotson   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

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

Attached documents:

---

Comment ID: PSLPP16/4765   Respondent: 10725793 / Ken Hotson   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

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

Attached documents:
| Comment ID: PSLPP16/10796 | Respondent: 10731329 / Sheila Hookins | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

| Comment ID: PSLPP16/14779 | Respondent: 10735777 / S. May | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

| Comment ID: PSLPP16/6931 | Respondent: 10756449 / Richard and Valerie Overton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016) for the following reasons:

1). I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Clandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12581</th>
<th>Respondent: 10769121 / Ali Elson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/13592    Respondent: 10773441 / Barry Marshall    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

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

Attached documents:

---

Comment ID: PSLPP16/13683  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

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

Attached documents:

---

Comment ID: PSLPP16/15269  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.

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

Attached documents:

**Comment ID:** PSLPP16/9119  **Respondent:** 10785633 / Penelope Eagle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/15009  Respondent: 10796417 / Richard Shenton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The
policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3231</th>
<th>Respondent:</th>
<th>10796417 / Richard Shenton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/324  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

**FURTHER COMMENTS AND OBJECTIONS ON SPECIFIC POLICIES:**

**POLICY S1 – Presumption in favour of sustainable development**

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/18370  **Respondent:** 10799169 / Neal Basson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

**POLICY S1 – Presumption in favour of sustainable development**

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/17516  **Respondent:** 10799425 / Guildford Greenbelt Group (Susan Parker)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

We object to policy S1 as stated and the presumption in favour of sustainable development
While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognize that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include:

- "empowering local people to shape their surroundings"
- "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
- "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
- "contribute to conserving and enhancing the natural environment and reducing pollution"
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
- "conserve heritage assets in a manner appropriate to their significance"
- "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.

There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development
in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

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

Attached documents:

---

Comment ID: PSLPP16/13423  Respondent: 10800065 / David Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the local plan as the development proposed is not sustainable

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

Attached documents:

---

Comment ID: PSLPP16/2469  Respondent: 10802177 / roger harrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Presumption in favour of sustainable development jars with other requirements, such as protecting Green Belt. There is no process laid out as to how such conflict would be managed.

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

Attached documents:

Comment ID: PSLPP16/13280  Respondent: 10803809 / David Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

Comment ID: PSLPP16/813  Respondent: 10804961 / M. Basson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

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

Attached documents:

Comment ID: PSLPP16/11759  Respondent: 10805537 / Robert Mote  Agent:
I object most strongly to GBC’s proposed submission of Local Plan June 2016. My reasons are as follows:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable or viable as it will damage local communities by over development, particularly Ripley, Send and Clandon. The local communities do not need extra housing. There are no railway stations at Garlick’s Arch or Wisley Airfield and inadequate bus services, therefore most adults will have to have a car. The Plan does not contain any provisions to improve the infrastructure for Garlick’s Arch.

It would make more sense for the developments to be in urban areas where there is sustainable transport.

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

Attached documents:

---

I object to the 2016 draft local plan for the following reasons:

**I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?
POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing.
Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/11887  Respondent: 10811361 / Simon Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

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

Attached documents:

Comment ID: pslp171/3188  Respondent: 10811361 / Simon Crago  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E. Policy S1 Presumption in favour of Sustainable Development

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are urban sprawl. Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. In particular there is a real lack of public transport with recent cuts to local bus services, there is no train stations in the area of the proposed development and the local roads which are already under strain will do not have plans for improvement. As a doctor I am concerned about the lack of medical services in the area. There are also insufficient leisure services with no plans to expand local sports centres in spite of the planned increase in residents.

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

Attached documents:

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12809</th>
<th>Respondent: 10820417 / Trevor Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development is not sustainable (policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12815</th>
<th>Respondent: 10820481 / Lisa Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development is not sustainable (policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13930</th>
<th>Respondent: 10822913 / Karen Dougherty</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

This local plan seeks to reduce overall development in town centre and urban areas compared to 2014 by almost 10% and instead seeks to increase the overall housing development in rural and green belt villages by insetting 15 villages. The proposed increase in rural areas from 2014 to 2016 is almost 12%. This is totally disproportionate and unacceptable.

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

Attached documents:

Comment ID: PSLPP16/12012  Respondent: 10828801 / Kathryn Fox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We purchased our home in the rural village of Send and do not want to be part of a large town. The current school, doctor’s surgery and surrounding roads are already at full capacity; this large scale development is not wanted or required. The roads are already busy and congested and there is a huge increase amount of vehicles travelling over the speed limit through the village making it dangerous for the community.

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

Attached documents:

Comment ID: PSLPP16/6624  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object particularly to the proposed development at Garlick’s Arch and Gosden Hill Farm. The developments are out of proportion to the surrounding area and do not qualify for exceptional circumstances required to take them out of the Green Belt. In addition, I object to the planning policies as follows.

I object to POLICY S1 – Presumption in favour of sustainable development

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.

- No reference to most of the NPPF Core Planning Principles.

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

Attached documents:
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3461</th>
<th><strong>Respondent:</strong> 10843361 / Natalie Brown</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

**I object to the Local Plan for the unsustainability of the development proposed (Policy S1)**

The proposed number of houses for the Borough will damage local communities, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services. This means that people who buy houses here will have to rely on cars which will clog the whole area. Why not target urban areas, with good public services, for more development rather than small villages whose characters will change as a result of over-development.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10171</th>
<th><strong>Respondent:</strong> 10844609 / Sam Critchlow</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

**I object to POLICY S1 – Presumption in favour of sustainable development**

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.
- No reference to most of the NPPF Core Planning Principles.

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

**Attached documents:**
Comment ID: PSLPP16/14519  Respondent: 10846625 / Frank Drennan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1.1 I object to policy S1 as stated and the presumption in favour of sustainable development on the grounds that;

1.2 The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

1.3 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

1.4 The most gaping hole in Policy S1 is its failure to protect the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice.

1.5 The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development.

1.6 This policy also ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:

Comment ID: pslp171/2125  Respondent: 10847521 / Andrew Procter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

1.1 I support the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

1.2 I am of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. I am however disappointed that they have failed to put this policy into sharp practice in forming this plan.

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

Attached documents:

Comment ID: PSLPP16/46  Respondent: 10852161 / Andrea McGeachin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
2. I object again to the plan bringing too much development in one area of our borough. I am for development of affordable housing but this plan is disproportionate.

   1. Though I do believe in affordable housing development this plan is not in my view considering affordability and is squeezing too much into these smaller more expensive and so I guess profitable areas. Instead of placing distributed development across the borough to support the whole borough. The numbers are too focused in our area.

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

Attached documents:

---

Comment ID: PSLPP16/7169  Respondent: 10854113 / Sarah Pickering  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

WE OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/2165  Respondent: 10855553 / Emma Tallick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially
Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch
(A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has
nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:

Comment ID: PSLPP16/14640  Respondent: 10857249 / Alice Pashley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2943  Respondent: 10857249 / Alice Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8879</th>
<th>Respondent: 10857889 / William Kyte OBE</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1: Presumption in favour of sustainable development

I OBJECT to this policy.

While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development. It also fails to balance the three prongs of Sustainable Development (economic, social and environment) being heavily biased to economic development.

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

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12838</th>
<th>Respondent: 10858401 / Philip Kite</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Yet another unsustainable local plan, why is it always Ripley?

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

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18586</th>
<th>Respondent: 10858977 / Angela Otterson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:
The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:

---

Comment ID: PSLPP16/11818  Respondent: 10863969 / Joanne Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

---

Comment ID: PSLPP16/1597  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3114  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp171/2940  Respondent: 10867585 / Hugh Shanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14521</th>
<th>Respondent: 10876033 / Lucie Paulson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to Policy S1, sustainable development</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- no recognition of the Green Belt</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12040</th>
<th>Respondent: 10876993 / Michael Hurdle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Policy S1 - Presumption in favour of sustainable development</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object – The policy fails to accept the current infrastructure deficit, principally though not exclusively concerning roads. The plan does not appear to have to have had the permitted ‘Constraints’ applied; in this area, Green Belt and already gridlocked roads could and should have been used to constrain the target for building homes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Concentration - It is proposed that just five sites (A25, A35, A42, A43, A44) will deliver nearly half of Guildford’s new homes – these sites are concentrated in a tight cluster of adjacent villages, (Burpham, Clandon, Send, Lovelace (Ripley), Horsley,) putting enormous strain on transport and social infrastructure in a small area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impossible infrastructure - The Council claims that all development is predicated on the delivery of new infrastructure. New links may well improve roads such as the A3 itself, but there is no conceivable improvement which could be made to any road joining the A3, e.g. the Burnt Common area, when the entire purpose is to attract more traffic at these points.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>It is pointless to rely on an infrastructure which it is physically impossible to deliver, at any level of funding.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18477</th>
<th>Respondent: 10877025 / Maureen Stephens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 210 of 596
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/117  Respondent:  10878273 / Charlene Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the disproportionate amount of development of one area in the borough.

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

Attached documents:

Comment ID: PSLPP16/10990  Respondent:  10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development , as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2854  Respondent:  10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/2377  Respondent: 10880257 / Carolyn Whitfield  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

2. I object to the Local Plan as the proposed development is not sustainable (Policy S1)

The 13,860 extra houses is not sustainable, my village of Ripley and local villages of Send and Clandon will be damaged, we don’t need these extra houses in our local area. The plan lacks any infrastructure improvements for Garlicks Arch. This development must surely be more suited to an urban area with transport already on hand.

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

Attached documents:

Comment ID: PSLPP16/18196  Respondent: 10883201 / Danny McHugh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2874  Respondent: 10883201 / Danny McHugh  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

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

Attached documents:
Comment ID: pslp171/3134  Respondent: 10884545 / Sarah O'Hagan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/1097  Respondent: 10884993 / Dave Fassom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, especially for the villages between Guildford and the M25, including Ripley, Send and West Clandon. Not only will the services in these villages be unable to cope with the level of development proposed, the proposed developments themselves do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are constantly being reduced. Residents will have no option but to rely on their cars. These sites are totally unsuitable due to being unable to access sustainable transport. Furthermore, the Infrastructure Plan shows no plans to improve the infrastructure for Garlick's Arch. Residents will have to rely on their cars for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical and sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from significant congestion. Further vehicle movements will only result in ever more acute congestion and increased pollution. Residents and the environment will suffer as a result.

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

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The same is true of Guildford itself with all approach roads grid-locked at certain times of day. The cost to business of congestion is huge with the adverse consequences impacting residents through health damaging air quality and road accidents. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. No one is asking for a 40% increase in retail in Guildford, except maybe Retailers, yet that will exacerbate the adverse effect of more traffic coming to Guildford. Car parking charges must be increased in line with cities like Cambridge if GBC is serious about reducing congestion. A tunnel under the A3 will be hugely expensive and the money would be better spent improving rail travel between Portsmouth and London and the rail and bus links to adjacent locations.

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

Attached documents:
I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

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

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The 13,860 new houses proposed is totally unsuitable- it will damage local communities by over development, particularly Ripley, Send and Clandon. The local communities do not need this number of houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan does not include anything to improve the infrastructure for Garlick's Arch.

The development should be in urban areas not in green areas, where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

---

Comment ID: PSLPP16/158  Respondent: 10901121 / Bernie Hales  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the disproportionate amount of development in one area of the Borough

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

Attached documents:

---

Comment ID: PSLPP16/9140  Respondent: 10906145 / Joe Gervasio  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses and there is no prospect of adequate infrastructure for them. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Local Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport, and the genuine need can be met in on brownfield sites close to transport hubs.

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

Attached documents:

---

Comment ID: PSLPP16/18111  Respondent: 10910273 / Lynda M Williams  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10107  Respondent: 10910369 / Karen Doyle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: PSLPP16/12734  Respondent: 10910625 / Alyson Blackwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure. Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

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

Attached documents:

Comment ID: PSLPP16/12144  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11114</th>
<th>Respondent: 10911425 / Andrew Gray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The development of nearly 14,000 new houses proposed in the plan is unsustainable; it will create a detrimental impact by over developing the local communities, especially Ripley, Send and West Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) and Gosden Hill have no railway stations within easy walking distance and inadequate bus services, leaving no alternative for the 5000 new residence to travel by car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15504</th>
<th>Respondent: 10911425 / Andrew Gray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The 13,860 proposed houses are not sustainable and will damage the villages of Clandon, Send & Ripley by over development. The houses are not necessary or needed in local communities. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has not made the necessary improvements to infrastructure for Garlick's Arch - thus the local roads will become even more congested & will not be fit for purpose - this is not a sustainable option for modern development. The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7204  Respondent: 10915361 / Judy Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I outline my objections to the policies below:

POLICY S1 – Presumption in favour of sustainable development
I OBJECT to this impossible policy which fails to recognise that West Horsley has inadequate infrastructure, in particular the road network and transport capabilities to cope with development. This plan is unsustainable in rural areas.

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

Attached documents:

Comment ID: PSLPP16/10100  Respondent: 10920001 / Jeff Doyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: PSLPP16/14763  Respondent: 10920129 / Steven Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

OBJECT. While I support the idea of sustainable development, the rural areas identified for development lacks the infrastructure to support new housing on the scale planned. As such, it is not sustainable development.

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

Attached documents:

Comment ID: PSLPP16/12056  Respondent: 10922177 / Paul Knight  Agent:
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

Comment ID: PSLPP16/14442  Respondent: 10922177 / Paul Knight  Agent:

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

1. I object to the local plan as the development proposed is not sustainable (Policy S1)

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/11310  Respondent: 10923297 / Matthew Burnham  Agent:
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford's greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

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

Attached documents:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/11307  Respondent: 10930945 / Peter Perry  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the proposed development is not sustainable (Policy S1)
The local communities don’t need these houses. Garlick's Arch (A43) and Wisley Airfield (A35) have no railway stations and inadequate bus services. Almost every adult will have to have a car. It is unsustainable to build 13,860 proposed new houses– it will damage local communities by over-development, especially Ripley, Send and Clandon. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

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

Attached documents:
POLICY S1 - Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", thereby failing to apply the NPPF's most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

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

Attached documents:
The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

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

Attached documents:

Comment ID: PSLPP16/15357  Respondent: 10935201 / Cathryn Walton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decisiontaking.”1 Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given.2 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view this is a non-policy.

1 NPPF paragraph 14.

2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

3 Including: “empowering local people to shape their surroundings… Take account of the different roles and character of different areas… protecting the Green Belts around them… recognizing the intrinsic character and beauty of the
countryside and supporting thriving communities within it… Support the transition to a low carbon future… Contribute to conserving and enhancing the natural environment and reducing pollution… Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets… Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”

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

Attached documents:

Comment ID: PSLPP16/9613  Respondent: 10940673 / Carolyn Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

I object. 13,680 new houses proposed between Guildford and the M25 is not sustainable and will have a permanently detrimental impact on the existing local communities including Ripley, Send and Clandon. Over-development will damage these local communities which do not need this many new houses.

Furthermore, the services in these villages will be unable to cope with the level of development proposed. The proposed sites of Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations within easy walking distance and rural bus services are forever reducing leaving residents to rely on cars to get around.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:

Comment ID: PSLPP16/12790  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to this Policy as the development proposed will not be sustainable (policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy 81 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Policy S1 is deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.
The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

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

Attached documents:

---

Comment ID: PSLPP16/12793  
Respondent: 10940833 / Natasha Taylor  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

This policy largely disregards the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/38  
Respondent: 10942017 / Jason Fenwick  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The revised GBC local plan has not considered the local community and the effects in it. I understand the need for development but it is not being suggested in the right areas or size of development. We do not need a major junction at Burnt Common to serve Send and South Woking if development plans are considerate. We do not need industrial and warehousing developments in Send that can be made in Slyfield, and other town centre locations where vast swathes of brown field land/sites stay vacant. We haven't the social and local infrastructure for a further 500 houses in Send.

I strongly object to this new GBC local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/9257 Respondent: 10944161 / Stephen Benzikie Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3031  Respondent: 10944385 / Clare Benzikie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/16470  Respondent: 10945057 / Margaret Field  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

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

Attached documents:

Comment ID: pslp171/2955  Respondent: 10946721 / Gillian Allen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/84</th>
<th>Respondent: 10949921 / Jan Parker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3033</th>
<th>Respondent: 10952705 / Moira Maidment</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

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

Attached documents:

POLICY S1

I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan,

Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable" in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

Comment ID: PSLPP16/9246  Respondent: 10954209 / Anita Wilkinson  Agent:

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

I OBJECT to this policy.

Comments: sustainable seems to be whatever the councillors define it as. There exists in the NPPF guidance towards the preservation of the Green Belt. Perhaps the most sustainable move we could make is to protect the ‘lungs of London’, to protect farmland that might be called on to feed a population, and to respect that any cavalier decisions taken today might come with a heavy price for the next generation.

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

Attached documents:

Comment ID: PSLPP16/18309  Respondent: 10954849 / David Hayward  Agent:

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

I OBJECT to Policy S1 which doesn’t offer sustainable development as regards roads and rail infrastructure. The current road network doesn’t cope with existing demand, with frequent congestion on the M25 and A3 in particular, and the trains are already overcrowded. No pre-emptive planning has been made to alleviate these problems which will be much exacerbated by large increases in housing in the north-east of the borough.

I am particularly concerned about the impact of additional traffic on narrow winding local roads such as the A247 through West Clandon and the Ripley Road in East Clandon, which is already used as a cut-through to and from the A3. This would be much exacerbated by the proposed huge housing developments in the area which would inevitably result in a large increase in cars and travel.

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

Attached documents:

Comment ID: pslp171/3151  Respondent: 10955489 / Ian Carter  Agent:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable and with the recent Brexit vote to leave the EU, not in anyway need – it will damage local communities by over development, gridlock traffic especially in Ripley, Send and Clandon.

The local communities don’t need these houses.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport such as Guildford.

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

Attached documents:

---

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan but these are transcended by the result of the recent EU referendum. Expert opinion is certain we are about to enter a period of recession, future local housing needs will differ substantially from those you plan and as a consequence consideration should only be given to the development
of existing brown field sites in the Borough. In times of such dramatic political change and economic uncertainty the Green Belt boundaries must not be violated because of an obsolete plan superseded by recent national events.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/3078</th>
<th>Respondent: 10957025 / Pauline Masters</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

E. Policy S1 Presumption in favour of Sustainable Development - My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9074</th>
<th>Respondent: 10957857 / Adam Aaronson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

**POLICY S1 – Presumption in favour of sustainable development**

I OBJECT to this because although the wording is based on the National Planning Policy Framework (NPPF) – which is of course binding - this policy fails to recognise that development is unsustainable in rural areas, where the infrastructure is inadequate and the transport network cannot cope with the proposed scale of development. This should represent an absolute constraint on development.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6641</th>
<th>Respondent: 10958753 / Ingrid Molossi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as
“sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land
bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF
paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental
impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18395</th>
<th>Respondent: 10959265 / Inger &amp; Ron Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>As a resident of East Horsley I strongly object to much of the the Proposed Submission Local Plan in respect to East and West Horsley.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I question the Borough housing targets set out in Policy S2. I therefore accordingly object to Policy H2.

I object to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I also object to the proposed East Horsley boundary change which cannot be justified.

I object to the proposal to designate roads south of the A246 as being within the identified boundary of East Horsley village and to allow limited infilling within this area.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the current needs of East Horsley is already a serious deficiency in the Proposed Submission Local Plan and I object to the infrastructure proposals on these grounds. I also strongly object to the proposals for the East Horsley infrastructure in that they do not meet the stated objective of providing a timely infrastructure to support the proposed developments.

I consider that the proposed western movement of the East Horsley settlement boundary needed to bring site A39 within the settlement area as unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt, as such and with no ‘very special circumstances’ to justify housing development on it I object to Policy A39.

I strongly object to the site allocation policies A37, A38, A40 and A41.

These four policy sites are all located within the Green Belt. One is a partially brownfield development but the other three sites are all used for agriculture and all sit within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants to justify these settlement boundary movements appear to me unfounded and in no way meet the requirements of the NPPF.

These boundary movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries must be reconsidered.

These proposals appear contrary to the principles of the Metropolitan Green Belt.

I also strongly object to Policy A35.

I object to the proposal to remove Wisley Airfield from the Green Belt and the enormity of the proposed development of it, due to the strain it will place on existing infrastructure and amenity.
I object to Policy E2 insofar as it omits to confer "public transport interchange" status on Effingham Junction Station without good reason.

Obviously I appear to strongly object to many aspects of to the Proposed Submission Local Plan which although I appreciate has had much time spent compiling and revising, still fails to address the ‘objective’ in a manner acceptable to the majority of residents effected.

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

Attached documents:

---

Comment ID: PSLPP16/18481  Respondent: 10959265 / Inger & Ron Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/10469  Respondent: 10960033 / Lucinda Kalupka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed development does not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. Please find below photos of recent congestion in the village of West Clandon on The Street - leading to accidents and possible injury to pedestrians and school children on the narrow pavements.

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

Attached documents: 2.JPG (100 KB)
1.JPG (124 KB)
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

---

**Comment ID:** PSLPP16/12277  **Respondent:** 10962689 / Martin Ladd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2878  Respondent: 10962689 / Martin Ladd  Agent:

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/14389  Respondent: 10962785 / Derek Gilmore  Agent:

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11946</th>
<th>Respondent: 10967489 / Jenny Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
</tbody>
</table>

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

The Plan is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by the over development of Ripley, Send and Clandon. The local communities don’t need these houses. The former Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and already inadequate bus services, so almost every adult will have to have a car. The
Plan has nothing to improve the infrastructure for Garlick's Arch. The development should be in urban areas where there is sustainable transport.

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

Attached documents:

Comment ID: pslp171/2952  Respondent: 10967649 / Ian Cornwall  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1 

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/6359  Respondent: 10969601 / Jenny Paviour  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 

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

I feel that Guildford Borough Council has had a complete failure to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

Attached documents:

Comment ID: pslp171/2811  Respondent: 10970497 / Michael Cook  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1 

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/12934  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

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

Attached documents:

---

Comment ID: PSLPP16/9189  Respondent: 10985057 / Anthony Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Presumption in favour of sustainable development – I OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development and that level of constraint should be spelled out.

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

Attached documents:

---

Comment ID: PSLPP16/4982  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2872  Respondent: 10986689 / Richard Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9527</th>
<th>Respondent: 10987841 / Marion Bastable</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 draft local plan for the following reasons: <strong>I object to the local plan as the development proposed is not sustainable (Policy S1) The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8959</th>
<th>Respondent: 10987905 / Marika Chandler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3070   Respondent: 10987905 / Marika Chandler   Agent:

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/8371   Respondent: 10989601 / Margaret Mew   Agent:

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

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25,
including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/8315  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services such as roads, GP surgeries and schools in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Another serious accident on the narrow section of the A247 two days ago about 10am caused cars to be written off and potentially devastating consequences for a disabled resident of West Clandon. Every day I take my life into my hands trying to drive on to the A247 or walk the path alongside it. This is even more serious for young mothers pushing buggies and taking young children to school. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will severely suffer as a result.

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

Attached documents:

Comment ID: pslp171/3180  Respondent: 10990145 / Anne Lee  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/14622  Respondent: 10992225 / Emma Ringshaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact to existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles putting even greater pressure on the road infrastructure. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/3016  Respondent: 10992225 / Emma Ringshaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl! Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/7361  Respondent: 10992833 / Amanda Verny White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/11170   Respondent: 10998081 / David Marshall   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan–making and decision–taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16818</th>
<th>Respondent: 11000385 / Sheila Robins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO the Local Plan as the development proposed is not sustainable (Policy S1)

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13909</th>
<th>Respondent: 11002945 / David Guthrie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10415</th>
<th>Respondent: 11007073 / Gyles McIver</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/10440  **Respondent:** 11007425 / Kate McIver  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be relocated to urban areas where there is sustainable transport.

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

Attached documents:

**Comment ID:** PSLPP16/3957  **Respondent:** 11008225 / Russell Pascoe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

**Comment ID:** PSLPP16/7542  **Respondent:** 11010401 / J M Bates  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

---

Comment ID: pslp171/2995  Respondent: 11010401 / J M Bates  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

**Attached documents:**

---

Comment ID: PSLPP16/2442  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the draft local plan and have listed my objections below:

**Policy S1 - Presumption in favour of sustainable development.**

I object.

The plan has no regard for the Green Belt.

The plan has a development bias committing to approve applications wherever possible and without delay.

The Green Belt was set up to protect green areas in perpetuity and Policy S1 should commit to uphold its boundaries and protections.
No definition is given of 'sustainable development' - should meet needs of present without compromising the ability of future generations to meet their needs.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8743</th>
<th>Respondent: 11023009 / Julie Atkinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the local plan as the proposed development is not sustainable (Policy S1). The proposed number of houses will damage our villages, East and West Horsley in particular, and other local communities including Ockham, Ripley, Send and Clandon. The proposed development of Wisley Airfield is particularly flawed and without the necessary infrastructure in place will put unnecessary pressure on already busy roads and infrastructures in the Horsleys. A greater proportion of the proposed development – in line with need and not inflated – should be in urban areas where there is adequate and sustainable transport. The distance from Wisley to Horsley rail station would mean additional and untenable pressure on already congested roads. The 35% increase in housing planned in West Horsley is a prime example of unsustainable housing. The number and density of the proposed development far outweighs current housing and also levels proposed in other parts of the borough. Importantly, it is against policies within the National Planning Policy Framework. The number of houses MUST be balanced and revised in order to be sustainable in our villages. At present all of the development is on the green belt which is not a balanced and sustainable plan.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2042</th>
<th>Respondent: 11023585 / Jean Walker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

**Comment ID:** pslp171/3001  **Respondent:** 11023585 / Jean Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

**Comment ID:** PSLPP16/11666  **Respondent:** 11024257 / Jenny Richardson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
Comment ID: pslp171/2860  Respondent: 11032801 / Louise Springfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/17803  Respondent: 11033921 / Tim Depledge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Presumption in favour of the Green Belt - I object on the basis that his has not been followed based on the proposals within the plan - The proposals made do not allow sustainable development, or require it. How can c400 houses in West Horsley be classed as sustainable based on the lack of infrastructure and fact they are located a "flooding hot spot".

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

Attached documents:

Comment ID: PSLPP16/6964  Respondent: 11035361 / Marion Shipman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Policy S1 Presumption in favour of sustainable development objection

The Local Plan doesn’t demonstrate that this policy is met. The 385 + houses proposed in West Horsley accounts for an increase of 35% on the current number of homes in this area alone. In addition, 100 homes are proposed on a site in East Horsley near to the Station, adjacent to the West Horsley parish boundary. This is not in keeping with the number and density of housing in the local area. This equates conservatively to 1,000 additional people with no consideration of infrastructure and consequent environmental impact. The local schools are already full. Medical facilities are stretched, drainage inadequate, road infrastructure is narrow and poor, and parking difficult. Building this number of homes will lead to flood risk here and further downstream.

The developments should be in urban areas where there is sustainable transport and where the infrastructure issues highlighted above can be addressed. The already stretched train system in Horsley is not set up to cope with the additional commuters and car parking is already fully used.
In addition, developments at Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so every adult will have a car, putting additional pressure on the rail system.

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

**Attached documents:**
There is no mention of the Green Belt, which has been and is extremely important to Guildford and its environs and astonishingly no commitment to protecting it. There is a promise set out in legislation by means of covenant to protect green areas in perpetuity. As a result the law seeks to protect the Green Belt through the core planning principles laid out in the NPPF. Policy S1 fails to refer to most of these. Also it does not set out guidelines for applying sustainable development in practice to local planning decisions which may have long term damaging consequences.

There is no statement confirming how economic, social and environmental impacts should be balanced and differences resolved by the planners, leaving these matters far too open and therefore non protective and without proper guidelines.

This Policy should commit to uphold the Green Belt boundaries and protections with reference to NPPF.

I object completely to this policy where it commits to approve planning applications "wherever possible" and "without delay" because it shows this draft plan to have a pro-development bias. The lack of guidelines confirming the NPPF presumption in favour of sustainable development makes this policy so vague that it would, in practice, mean virtually no constraints on any development.

This policy shows contempt for the Green Belt, ignoring most of the core principles in support of protecting it set out in paragraph 17 NPPF.

I come to the conclusion that this, as a policy, is useless.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16512</th>
<th>Respondent: 11036801 / Judith Mercer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There are more than 100 definitions of sustainable development and possibly many more, yet this proposed policy has no proper definition or tests to describe what it means for Guildford. Sustainable development often has to deal with opposing requirements for example the tensions between economic growth and the environment. S1 has no means of distinguishing between these conflicts or weighting them to allow proper decisions to be made. The wording ‘wherever possible’ and ‘without delay’ is completely biased and will allow virtually all or any development to qualify as ‘sustainable’. This is exactly not what the NPPF para 17 guidelines aims to achieve.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16464</th>
<th>Respondent: 11037217 / Bo Johnson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes - OBJECT:

- Policy S2 states 13,800 new homes are required over the Plan Period from 2013 to 2033. This number of homes is too high and unsustainable in Guildford’s villages.
- Expansion of West Horsey is unsustainable with only one small shop and no post office, with reliance places on the one post office and doctors surgery in East Horsley. It is unsustainable to suggest to a high level of development in the village.
- The development of 385 homes on the 4 proposed sites in West Horsey are at much higher densities than are currently present and will be totally out of character with the existing mix of housing. The proposals for the timing of these homes is unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport as no provisions have been made to improve these.
- No evidence has been provided to substantiate the proposed numbers of housing desired by the plan, both in West Horsley and the borough as a whole. The West Horsley Parish Council and Surrey Community Action Housing Survey carried out in May 2014, identified a limited need for only 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home. Therefore the proposals of 385 homes in the village are out of touch with the true needs of the village.

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

Attached documents:

---

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over development, particularly in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. It is patently clear that the road and train network will not be able to cope with such an increase in usage and will lead to hazardous conditions for all.
The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the The National Planning Policy Framework (NPPF).

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6396</th>
<th>Respondent: 11040609 / Simon Long</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2794</th>
<th>Respondent: 11041025 / Debra Somner Fraser</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7317</th>
<th>Respondent: 11041121 / Catherine Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

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

Attached documents:
I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: PSLPP16/11542  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities and do not include infrastructure such as schools and doctors surgeries.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/12701  **Respondent:** 11042433 / Sam Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities and do not include infrastructure such as schools and doctors surgeries.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/10927  **Respondent:** 11043425 / Melinda McLean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object to the 2016 Local Plan as the development proposed is not sustainable (Policy S10) as there have been no provisions for infrastructure improvements or account taken of roads which are impossible to widen. the traffic is already untenable.

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

Attached documents:
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3144  Respondent: 11043553 / Geraldine Banks  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/14587  Respondent: 11044129 / Christopher Barrass  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds.

Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2958  Respondent: 11044129 / Christopher Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/14938  Respondent: 11045697 / Nick Hartwell  Agent:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

**Comment ID:** PSLPP16/12935  **Respondent:** 11047873 / Mary Waldner  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

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

Attached documents:

---

**Comment ID:** PSLPP16/6515  **Respondent:** 11047969 / Richard Poppe  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

---
As a resident of West Horsley, I would like to register my objections to the Guildford Local Plan, and specifically the plans as they apply to the villages of East and West Horsley; including the development of some 5-600 new houses in the Horsleys, and a further 2000 within two miles of the villages.

I have read the various documents explaining the details of the Local Plan, and it is clear that you are likely to be overwhelmed with letters of objection. It is very apparent that whole parts of the plans have either not been thought through, and indeed significant areas appear not to have been addressed in any way. It seems that there has been a very superficial attempt to create a solution that is clearly impractical, unworkable, and objectionable on various counts which I am sure will be clearly set out in a great many letters.

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

Attached documents:

I particularly object to the density sited in the local plan and the volume of housing.

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

Attached documents:

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area.
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2817  Respondent: 11049473 / Victor Bates  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objection to Policy S1 – Objection to GBC’s plans for “Sustainable Development” within East & West Horsley and Ockham / Wisley Airfield

I object to the proposed development of so many new homes within East / West Horsley and Ockham – the proposals are not sustainable and will damage the character and amenity of the villages. The facilities and services in the villages are limited and not extendable. Local schools and medical practice are already over subscribed and the train station car parks at Horsley and Effingham Junction are full to capacity, with no room for expansion. In summary the proposals to build such a huge number of new homes are unsustainable in terms of schooling, drainage, roads capacity, shops and parking in East Horsley (shops and station) and public transport – with limited capacity for busses on narrow roads.

I would support the relocation and expansion of the Raleigh School in West Horsley onto a new self-contained site within one of the sites designated for housing site A41 being the most suitable for such development. To that end, a new school would amount to “exceptional circumstances” under NFPP guidance – the existing site is constrained and woefully inadequate to provide suitable facilities for the 435 children on the roll. There are substantial waiting lists in every year except reception and the existing school playing field, being separated from the main school, is virtually unusable except on limited occasions when parent helpers can chaperone children across roads and temporary toilet facilities can be hired. The existing draft Local Plan fails to recognise the need for a new school to accommodate existing demand in the Horsleys and surrounding locale.

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

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:
I strongly object to the Local Plan as the development proposed is not sustainable (Policy S1)

The nearly 14,000 new houses proposed cannot be sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The road infrastructure is not great in these areas, there are issues with parking, often traffic jams etc. Also Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car, in our own Burnt Common close some homes have 4 or 5 cars which causes parking issues. The proposed Plan has nothing to improve the infrastructure for Garlick's Arch, which has had issues of flooding as well as its poor access, but even if the Plan did have some infrastructure improvements I would still object for some of the reasons 2 to 13 below.

I believe the development should be in more urban areas where there is a more sustainable transport infrastructure.

Furthermore I am sceptical of the claimed need for so many new houses and light industrial as we now have the Brexit scenario – likely to have fewer immigrants (and Politian’s claiming those EU citizens here may be sent back to their home countries) and we have already seen an issue with business confidence and with the likelihood of a recession looming, I believe that GBC need to revisit the assumptions under which they have proposed this Local Plan.

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

Attached documents:
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

The narrow and windy nature of the A247 through West Clandon and the dangers of entering and exiting the over 100 properties and amenities which have entrances directly onto this road have not been taken into account.

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

Attached documents:
**Comment ID:** PSLPP16/8822  **Respondent:** 11071553 / Nicholas Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

POLICY S1 (SUSTAINABLE DEVELOPMENT) – I object, since it doesn’t define what it understands sustainable development to mean, doesn’t peg this to the NPPF’s Core Planning Principles and doesn’t give decision-makers any guidance for applying it in practice to planning matters. It fails to say how economic, social and environmental impacts should be balanced. Amazingly, it doesn’t even mention the Green Belt, the most important example of sustainable development policy in Guildford, and it doesn’t undertake to protect it.

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

Attached documents:

---

**Comment ID:** PSLPP16/12380  **Respondent:** 11074465 / Louise Vaughan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The Policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The Policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The Policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The Policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this Policy virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long-term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this Policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This Policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

---

Comment ID: pslp171/2882  Respondent: 11074465 / Louise Vaughan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

---

Comment ID: PSLPP16/6484  Respondent: 11074561 / Tim Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Re: Objections to Guildford Borough Proposed Submission Local Plan (June 2016). After long consideration of the latest Local Plan, I would like to submit my objections in the sincere desire to protect Guildford from gross overdevelopment and a scandalous abuse of the Green Belt.
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

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

WE OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2884  Respondent: 11098369 / Neil & Nicki Covington  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp171/2923  Respondent: 11098977 / Jilly Cooper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: PSLPP16/16119   Respondent: 11100193 / Michael Turner   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:

Comment ID: PSLPP16/6825   Respondent: 11114721 / Elizabeth Wilcockson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The
former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages
are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable
due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should
be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable
transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

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

**Attached documents:**
We suggest that the significance of the Society as a contributor to the Borough is given as much prominence in the Plan as for example Surrey University and Watts Gallery that are included. With the volume of staff and volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the Borough.

The charitable purpose of the RHS is to inspire passion and excellence in the science, art and practice of horticulture. RHS Wisley is vital to the ability of the charity to deliver its purpose. The Garden is the most effective tool for educating the public (both adults and children) about horticultural skills for growing food and ornamental plants, science and environmental issues, as well as design It also acts as the base for all its public facing outreach work, including in local communities and schools.

The RHS has recently undertaken a comprehensive masterplanning process exploring the suitability of the existing ageing facilities and infrastructure at Wisley to meet the RHS’s longer term objectives as set out within the Masterplan Vision. This identified improvements to existing facilities at the Garden that are necessary to accommodate the projected increase in visitor numbers, and the Society has publically committed to a major investment at Wisley, alongside a Strategic Investment Programme that will be a step change to the Society’s charitable delivery in coming years. It is a pivotal moment for the RHS.

The following projects have been identified through the masterplanning process as being necessary to accommodate this growth at Wisley:

- Improvement to the garden entrance and retail facilities;
- Enhancement of the Laboratory building;
- A new National Centre for Horticultural Science and Learning;
- New office accommodation for a larger work and volunteer force;
- Improvement to the horticultural support (machinery yard and glass houses); and
- A new staff car park to avoid conflict with visitors.

This masterplan is now in the process of being implemented and the following planning applications were formally submitted to Guildford Borough Council (GBC) in April and May 2016 and are currently being determined by GBC planning department:

- The Barn (application reference: 16/P/00954) – New office accommodation;
- Hilltop (application reference: 16/P/00976) – A new National Centre for Horticultural Science, and Learning;
- Front of House (application reference: 16/P/01080 & 16/P/01081) - Improvement to the garden entrance and retail facilities and enhancement of the Laboratory building; and
- New Substations (application reference: 16/P/01037).

The RHS want to ensure that the Local Plan supports the delivery of the masterplan for Wisley and the continual improvement of the Garden. The GBC Proposed Submission Local Plan: Strategy and Sites document forms the final consultation version of the GBC Local Plan following the consultation of the Draft Local Plan Strategy and Sites Document in the summer of 2014.

Below we set out our representations in response to the Proposed Submission Local Plan: Strategy and Sites document.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15837</th>
<th>Respondent: 11150913 / Sarah Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1124</th>
<th>Respondent: 11151617 / Nigel Tallick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Policy S1</td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

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

Attached documents:
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: pslp171/2543  Respondent: 11199841 / Woodstreet Village Association (Neville Byran)  Agent:

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

We support policy 4.1.4. We recognise the policy now complies with the NPPF.

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

Attached documents:

Comment ID: PSLPP16/17284  Respondent: 11458241 / Bewley Homes  Agent: Bewley Homes Plc (David Neame)

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

Policy S1 – SUPPORT WITH RESERVATION:

Bewley is supportive of the Council seeking to import the general presumption in favour of sustainable development set out at paragraph 14 of the Framework into the Development Plan. This approach has been followed by many other Local Planning Authorities in the Country and will provide a sound basis for decision making in the Borough if applied correctly at the Development Management stage.

Bewley would however recommend that the Council also includes the reference within the first sentence of Paragraph 49 of the Framework, which reminds decision makers that proposals for residential development should be considered in the context of the presumption in favour of sustainable development.

The addition of this reference would ensure the policy properly reflects the Framework and will assist the Council in proactive decision making during the life of the Plan.
We understand that the NPPF is underpinned by a presumption in favour of sustainable development and we note that Policy S1 largely replicates that set out in the NPPF. However, we believe that the policy, as currently worded, fails to include a fundamental part of the NPPF policy, namely Footnote 9, and we would urge the Council to amend the latter part of the policy accordingly.

Paragraph 14 of the NPPF makes it clear that for both plan making and decision taking, where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

In practice this means that, where the development plan is unsatisfactory, planning authorities in areas such as, inter alia, AONBs or Green Belt should apply the NPPF policies on AONBs or Green Belt rather than simply apply the sustainable development principles of the NPPF.

Paragraph 14 of the NPPF with its Footnote 9 in effect transfers the starting point for assessment of planning applications in an AONB for example to paragraphs 115 and (if appropriate) 116. Therefore, for the Local Plan to leave out Footnote 9 (or their own version of it, providing it includes all the areas of constraint listed in the NPPF as a minimum) misleads the decision maker into applying the presumption in favour of development when in fact in some cases, as set out above, such a presumption wouldn’t automatically apply.

Furthermore in relation to the above, we would question whether the Council have understood and had regard to the provisions of Paragraph 14 (and Footnote 9) of the NPPF in the process of developing this local plan. We are not convinced that sufficient justification has been provided for the unsustainably high levels of development proposed for the Borough. It would appear that sites have been allocated in the plan to deliver as a minimum the objectively assessed development figures that have been calculated, without any consideration of Paragraph 14 which requires the Council to plan for objectively assessed need unless specific policies in this Framework indicate development should be restricted (such as, inter alia, AONB, Green Belt, SSSI and areas at risk of flooding). With a significant proportion of the Borough subject to restrictive national planning policies, Paragraph 14 of the NPPF justifies the Council not meeting its objectively assessed development needs.

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

Attached documents:
I object – When our children were at secondary school (George Abbot School) there was often a real problem getting them to school in the morning due to heavy traffic. At peak times Send Road (A247) and the A3 are often congested and sometimes completely gridlocked due to roadworks or simply the sheer amount of traffic.

It should be noted that as well as being a cut through for those who want to access the A3 and M25 from Woking, Send is also the cut through to Woking particularly the station in the other direction. The mini roundabout at one end of Send at Old Woking really does struggle to cope with the traffic going both ways!

It is proposed that just five sites (A25 A35 A42 A43 A44) will provide nearly half of Guildford’s new homes – these sites are in Burpham, Clandon, Send, Lovelace and Horsleys. I am therefore very concerned about how a road system already under such pressure can cope with any more traffic resulting from all these new homes?

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

Attached documents:

---

Comment ID: PSLPP16/2472  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

The Guildford Vision Group is pro—growth and supports good, well designed development. Guildford Town Centre is about to undergo a sustained period of significant development, including creation of an additional 48,000sq m of retail and related space, principally via the redevelopment of North Street. It is hard, if not impossible, to discern from the Local Plan how such considerable development will be served by appropriate infrastructure.

It is not clear what public benefits will accrue in the shape of new public space and better public realm.

There is no sense of an overarching plan or design ethos that will support and enhance the historic core of the town that makes it so attractive to its residents and to a wide range of visitors.

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

Attached documents:

---

Comment ID: PSLPP16/4745  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

6   POLICY S1 SUSTAINABLE DEVELOPMENT
6.1 I object to policy S1 as stated and the presumption in favour of sustainable development.

6.2 The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

6.3 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
6.4 The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

6.5 The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

6.6 The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

6.7 This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

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

Attached documents:
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

Attached documents:

Comment ID: PSLPP16/93  Respondent: 15104673 / Robert Morley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/119  Respondent: 15106689 / Joseph Hine  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the overbearing size of the proposed developments at your strategic sites of Wisley airfield, Garlicks Arch and Gosden Hill as all of these sites are larger than the villages that are established and are proposed to act as hubs for new residents to use for facilities amenities and transport. I appreciate some development is required but it should be in proportion to surrounding established villages to complement and improve rather than to overshadow and swamp them. The sites proposed would be significantly overdeveloped.

2. I object to your allocation of a large portion of housing development within a small geographical area of the borough, the housing development should be based not only on a few large sites which are easier for developers to profit from but on smaller sites that can be scattered across the borough to distribute pressures on services and facilities evenly, the inclusion of a single large site should mean no other large sites are allowed within close proximity due to the massive increase of traffic, density of housing and pressure on local infrastructure this will bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8904  Respondent: 15107297 / Ian McQuattie  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/167</th>
<th>Respondent: 15109377 / Cara Crawford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. **Unbalanced allocation of development in one area of the Borough**
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10921</th>
<th>Respondent: 15138273 / David Latin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Section 150 of the Housing and Planning Act 2016 states that a site, once identified in a Local Plan, is assumed to have permission to go ahead in principle, which means normal planning restrictions may be difficult to impose later.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17825</th>
<th>Respondent: 15144065 / Margaret Heard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to proposed development in the local plan policy S1 as it is 'not sustainable'! The impact on local communities and to the infrastructure of these areas will be unbearable. The roads and local services are already in a terrible state of function and repair, so nearly 14,000 new homes planned for the Ripley, Send and Clandon areas alongside (A35) Wisley airfield and (A43) Garlick arch sites will not be at all sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/569  Respondent: 15145057 / Vincent Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Regarding the above plan proposed by Guildford Borough Council (GBC)

I have several points that I wish to raise and a number of objections that I wish to be logged.

• Objection 1 (Policy 52). GBC in the 2014 consultation declared that that their intention was to build 652 houses/year (between 2013-2033). Now in their most recent plan they are aiming to build 693 houses per annum. This increased number would severely impact on our already congested roads, on GP surgeries, hospitals, schools and shows complete disdain regarding preservation of Green Belt land.

• Objection 2 (Policy P2). This policy involves the creation of new boundaries to inset the villages of Send and Send Marsh/Burnt Common. Thus removing their Green Belt status. Can GBC really act with impunity when their proposal breaks this government's promise to "Protect the Green Belt"? Its removal would result in urban sprawl and gridlock. The Green Belt is also there for the purpose of access to clean air and to provide a safe habitat for wildlife.

• Objection 3 (Policy A43). The proposal, referred to as Garlick's Arch to build 400 homes and 7,000 sq.m space for additional light industry and warehousing. This would lead to a 41% increase in population in the area. The proposal is that these houses are to be built on the agricultural land based just outside the Send March/Burnt Common village boundary. Again, if this goes ahead it will result in filling our roads with more cars and HGVs. The arterial A3 autoroute and the surrounding roads are already operating at full capacity. Putting more vehicles on the road will result in intolerable levels of noise and unacceptable levels of pollution from nitrogen dioxide and other harmful pollutants.

• Objection 4 (Policy A43a). The addition of two more slip-roads to and from the A3 and the A247 (Oandon Road) again will result in total congestion. Send Road leading to Woking has resident's cars parked on either side of the road leaving a very narrow space for cars and vans to pass one another and in most instances one has to give way to oncoming traffic. This is also the case with Clandon Road which is narrow and winding and already operating at full capacity. These roads are dangerous to pedestrians crossing, cyclists, and for residents exiting from side roads. I can only assume GBC did not seek the advice of a road traffic consultant or they would not have arrived at such a ludicrous plan.

• Objection 5 (Policy A25). If the proposed 2,000 housing development goes ahead at Gosden Hill it will result in high visibility urban sprawl obliterating the rural nature of the area and have a massive negative affect on the A3 and local roads. Good regeneration planning requires ingenuity, empathy and the ability to adopt a holistic approach that satisfies the need for new housing and small business development whilst taking into account the needs of the resident population, the existing infrastructure and the need to preserve as much of the Green Belt as possible. These key features are missing from the GBC proposal ...
Policy S1 ‘Presumption in Favour of Sustainable Development’
We support the presumption in favour of sustainable development and the Council’s commitment to work proactively with applicants to jointly find solutions that mean proposals can be delivered wherever possible. However, this commitment does need to be used positively at ground level in the decision making process when determining planning applications.

I object to the 2016 draft local plan for the following reasons:
** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

Please read and take note of my OBJECTIONS to all of the points listed below,
1) I OBJECT TO the local Plan Policy S1, the development planned is in no way sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/717  Respondent: 15155201 / Ann Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.) The Local Plan as shown in the development proposed is not sustainable. (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/735  Respondent: 15155617 / David Vallath-Patel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/768  Respondent: 15157505 / Linda Leunissen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The number of new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. These villages are popular due to their old world, small village charm, which will be completely undone by your proposed development.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. Local roads will not be able to deal with these number of cars. The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/775  Respondent: 15157601 / Barbara Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15537  Respondent: 15172641 / Michael Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed mass housing developments will damage local communities, especially Ripley, Send and Clandon.

The development is better suited to urban areas that can provided transport links, these plans are not for local communities, we do not have good rail links, and quite poor bus services, so that means more cars on the local roads.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/1060  Respondent: 15174145 / Kathleen Mylet  Agent:  
 Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

5) I object to the disproportionate amount of development in one area of the Borough. (S1)  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/963  Respondent: 15185537 / Peter Mills  Agent:  
 Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016), for the following reasons:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)  

   The proposal is for too many properties leading to over development, whilst there appears to be nothing to improve the infrastructure & services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Comment ID: PSLPP16/1116  Respondent: 15196097 / Mark Groves and Katie Hamilton  Agent:  
 Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
 Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)  

   13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.
The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1154</th>
<th>Respondent: 15196577 / Kate and John Harris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed is not sustainable (Policy S1) the new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch. We are losing too much of our countryside and rural areas - please keep some of the UK as it should be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1178</th>
<th>Respondent: 15198337 / Jack Tallick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1200</th>
<th>Respondent: 15205729 / John Walker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
These are my main reasons/ I object on these grounds / ...

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1240  Respondent: 15207457 / Robert Erhardt  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan (Policy S1) as the development proposed is excessive for the area. The proposed 13,860 new houses is such an overdevelopment it will adversely affect local communities. As well, there is insufficient rail access and a limited bus service to cater for the increased population. Private cars will be a necessity and cause congestion. Schools and other infrastructure are also insufficient. ,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1246  Respondent: 15207489 / Linda O'Cain  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is excessive for the area and not sustainable (Policy S1) There is not sufficient public transport to cater for any of the residents of the proposed 13,860 new houses and certainly not sufficient capacity on local roads of any size for their cars. Local communities function currently well and will be adversely affected by development of this magnitude.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16397  Respondent: 15216129 / Timothy Hewlett  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is excessive for the area and not sustainable (Policy S1) The development should be in urban areas where there is sustainable transport.
I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve infrastructure for Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1305  Respondent: 15220097 / Douglas Barr Trudy Amos  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object wholeheartedly to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

We set out below our objections to specific policies and matters within the Plan.

1. We object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13732  Respondent: 15227905 / Nigel Alexander  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1466  Respondent: 15233889 / Claire Sallows  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Firstly, I object to the Local Plan due to lack of long term sustainability of the proposed development (Policy S1)

The number of new houses proposed is not sustainable as it will damage local communities by over development, especially Ripley, Send and Clandon, and with further impact to Old Woking. The traffic levels are unacceptable already, and funnel into Woking via a supposed Conservation area where Old Woking High Street is protected for historical reasons as a road designed for traffic volumes in the early 20th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1483  Respondent: 15234177 / Brianne Vally  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local plan in its current form is for a number of reasons not fit for purpose and these are detailed below.

1. I object to the disproportionate amount of development in the borough especially Wisley Airfield and Garlick's arch. I believe a number of villages especially Ripley, Send and Clandon will be negatively impacted. (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1489  Respondent: 15234273 / Martin Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
5. I object to the disproportionate amount of development in the borough especially Wisley Airfield and Garlick’s arch. I believe a number of villages especially Ripley, Send and Clandon will be negatively impacted. (policy S1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10371  Respondent: 15238049 / Glenda Charlick  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1615  Respondent: 15240161 / R O Moore  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I lived in Kiln Lane, Ripley for over 22 years and object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) on the following grounds.

1. The development proposed is not sustainable (Policy S1)

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. We don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services and resultant car usage will be high. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU any may reduce the demand for new housing in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1728  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY S1 - Presumption in favour of sustainable development

OBJECT. The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", thereby failing to apply the NPPF's most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. STRATEGIC POLICIES

This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development

I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1821  Respondent: 15247745 / Brian Aitcheson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable and with the recent Brexit vote to leave the EU, not in any way need – it will damage local communities by over development, gridlock traffic especially in Ripley, Send and Clandon.

The local communities don’t need these houses.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport such as Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object [very strongly] [in the strongest possible terms] [wholeheartedly] to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable
due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should
be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable
transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/3064  **Respondent:** 15263073 / James Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/2076  **Respondent:** 15263905 / Philip Walker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3047  Respondent: 15263905 / Philip Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2090  Respondent: 15264001 / Robert Peake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3050   Respondent: 15264001 / Robert Peake   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7474   Respondent: 15264065 / Roshan Bailey   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
While I accept the principle of a presumption in favour of sustainable development, I think it is important to stress the sustainability aspect. In particular, I think this policy should be enhanced with some words to reflect the importance of the Green Belt within our Borough. Please also see my comments on Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2120  Respondent: 15264225 / Mel McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I object to the proposal to build around 14000 new homes in and around the villages within a 3 mile radius of Ripley village. The communities have evolved over many years and their patient gradual growth is acceptable but to saturate the area with that number of properties is not sustainable. Some of the road network is at a point of being dis functional as an example, the extremely narrow section through West Clandon. Policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2126  Respondent: 15264449 / Elaine McVickers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) I object to the proposal to build around 14000 new homes in and around the villages within a 3 mile radius of Ripley village. The communities have evolved over many years and their patient gradual growth is acceptable but to saturate the area with that number of properties is not sustainable. Some of the road network is at a point of being dis functional as an example, the extremely narrow section through West Clandon. Policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14921  Respondent: 15265377 / Emma Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not
sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2134  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

02  I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2160  Respondent: 15268641 / Sandy Homewood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes.

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages.

The Site Allocations list totals 12,698. Village expansion is unsustainable. With only one small shop, no post office, a very limited weekday only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station) and public transport.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.
We object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. We are surprised and concerned that GBC has adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. It should be noted...
that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable. Historically GBC has correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC has effectively ignored the real potential of the urban area to provide for housing. At the same time GBC has adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS (annex 5) which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMATHe report by Green Balance runs to 37 pages (annex 6) and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Guildford OAN Review D Reeve.pdf (172 KB)  
- NMSS SHMA review annex 5.pdf (1.3 MB)  
- Green Balance SHMA review annex 6.pdf (469 KB)  

Comment ID: PSLPP16/2264  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( )  
is Sound? ( )  
is Legally Compliant? ( )

Ministerial guidance in relation to building on the Green Belt is clear: 1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” – Nick Boles to Sir Paul Beresford MP 7th February 2014. 2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However, this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply constraints in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built
in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report. “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11909</th>
<th>Respondent: 15275201 / Jennifer Morritt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, and as highlighted 86% of household in the borough already own at least one car with a significant proportion owning more than one, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18653</th>
<th>Respondent: 15278369 / Ripley Parish Council (Jim Morris)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Distribution of Housing

26. A disproportionate part of the new housing provision is to be allocated to settlements and adjoining areas in the Green Belt, particularly in the Send/Lovelace Wards of the District.

27. RPC object to other Allocation Policies including:
   - A25 Gosden Hill Farm
   - A35 Land at former Wisley Airfield, Ockham
   - A36 Hotel Guildford Road East Horsley
   - A37 Land at Bell and Colvill, West Horsley
   - A38 Land at West Horsley
A39 Land near Horsley Station, West Horsley
A40 Land to the north of West Horsley
A41 Land to the south of West Horsley

28. These proposals together amount to a total of 4533 homes (approximately 35% of the total new housing provision for the whole Borough) within a 3 mile radius of Ripley. As such they are likely to indirectly and directly affect Ripley with the likelihood of traffic and infrastructure problems.

Traffic and Transport

29. There is no realistic proposal in the Plan for the provision of enhanced public transport, which could lead to significant modal shift. By the nature of the rural road network, the resulting substantial increase in road traffic would be likely to cause either (a) increased traffic on inappropriate rural roads; and/or (b) pressure to expand highway capacity with resulting urbanisation of the rural area.

30. The impact of these large scale principally housing developments (A43 Garlick’s Arch, A25 Gosden Hill, A35 Land at Wisley Airfield and A36-A41 Horsleys) on the roads around Ripley are likely to lead to unacceptable levels of traffic that cannot be mitigated due to the nature of the country lanes around Ripley and the listed buildings within the conservation area of Ripley.

31. They are also likely to add significantly to traffic on the already congested A3. Highways England have stated that the A3 north of Guildford to M25 is already at capacity in both directions in the peak hour. This problem will be exacerbated by the substantial new housing proposed for the rural area north of Guildford.

Infrastructure

32. Infrastructure problems are not limited to highways. New homes need schools, health, and other services which are not available in the local area. If these facilities are provided in the rural area, the intensification of activity will contribute to urbanisation of the rural area.

33. The full consequences of this approach is likely to include:
   Erosion of the Green Belt, harm to the landscape and historic character of some of the most attractive historic villages
   ? Large numbers of houses in places poorly serviced by public transport and local services, employment and retail facilities; resulting in
   ? Substantial increases in car borne commuting; resulting in
   ? Increased pressure on the existing unsuitable highway network, particularly the smaller unsuitable rural roads which will serve new or expanded settlements in the countryside north of Guildford, including Ripley, Send and Clandon, Ockham and East/West Horsleys
   ? Inappropriate highway works to increase junction capacities or to provide improved visibility splays; resulting in
   ? Loss of rural character and
   ? The creation of larger isolated communities with few services and harm to community cohesion.

34. RPC is very well aware of (and supports) the need to provide new affordable housing to serve existing and growing rural communities but the creation of isolated new or extended settlements of principally market housing as the basis for generating supply of affordable housing is misconceived and it is noted that, in any case, it does not remotely amount to sufficient affordable housing to meet local need. Guildford Borough has some of the highest costs of housing in the country, so that 80% of market value still remains unaffordable to many workers in the area.
35. Affordable housing in rural areas should be provided in or close to the settlements that it is going to serve, rather than as ad hoc adjuncts to larger new market housing developments. Such new development has historically been absorbed largely in or on the edge of rural settlements. Extensive and substantial new market housing areas in unsustainable locations causes irreversible harm to rural character, congestion and danger on rural road network and damage to social cohesion.

36. RPC considers that new housing, both market and affordable should be achieved close to and within major urban areas, principally in Guildford itself where high density housing can be provided on previously developed land close to services, shops and employment. Such an approach would be consistent with the principles of sustainable development in the NPPF. The current distribution strategy proposals are directly contrary to the principles of sustainable development in the NPPF.

Conclusions
37. Accordingly, RPC objects to the scale and distribution of housing proposed in Table 1 of the Plan “Proposed Delivery between 2018 and 2033”. The proposed delivery plan does not constitute sustainable development, would result in loss of rural character, harm to heritage assets, urbanisation, increased traffic and intensification of use and social isolation and harm to community cohesion.

38. RPC considers that the proposed Planned Delivery is so misconceived and so fundamental to the Plan that it is hard to see how it could be modified without large tracts of the Plan being re-written. Without substantial modification and rewriting, the Plan is not sound within the meaning of section 20 and paragraph 181 of the NPPF. RPC recommends that the Plan should be withdrawn or at least substantially modified by reducing significantly and re-distributing new housing currently proposed for the rural area in Table 1 Planned Delivery and by making consequent main modifications to the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17336</th>
<th>Respondent: 15280737 / Miller Developments (David Milloy)</th>
<th>Agent: The Chine Consultancy Advice Ltd (David Pugh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

At paragraph 4.1.1 the Council rightly acknowledges the presumption in favour of development and confirms that Local Plans must plan positively to meet the area’s objectively assessed development needs. It then goes on to state that the local plan must ‘be flexible enough to adapt to rapid change’.

It is Miller’s view that the plan is over dependent on large strategic housing sites and that should these be delayed in coming forward for any reason the plan does not provide the flexibility to bring forward alternative sites to meet any housing shortfall. Equally, as the ‘presumption’ also informs decision making decisions it is considered that should the Council fail to identify a five year housing land supply and fall behind on its housing delivery targets pressure will mount on unallocated sites.

The bringing forward of unallocated sites in an uncoordinated fashion will put pressure on the objectives of Policy S1 which seeks to ‘improve the economic, social and environmental conditions of the area’.

Whilst Policy S1 provides for the assessment of applications for which there are no relevant policies it is considered that the Plan Strategy will place undue reliance on this provision and whilst unplanned development may be able to mitigate any adverse impacts they may well not result in development in the most sustainable locations.

Accordingly, Miller considers that a wider range of housing allocations should be promoted with the reliance on the larger strategic site reduced or deferred to the next plan period when the ‘critical’ infrastructure has been provided. A wider range of housing allocations would also ensure that a more balanced approach is taken that spreads the impact of such development across the Borough on a scale that can be supported by ongoing infrastructure improvements, as opposed to the major schemes that would be required for the proposed strategic sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10939</th>
<th>Respondent: 15282625 / Kelly Graves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2505  Respondent: 15282977 / Tom Davies  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I object to Policy S1. It runs roughshod over the principles and legacy intended by the Green Belt concept by failing to protect them, and ignores most of the 12 Core Planning Principles set out in the National Planning Policy Framework (para 14).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2551  Respondent: 15284801 / Linda Jarvis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable(policyS1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2556  Respondent: 15284993 / Samantha Thompson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)
I object whole heartedly to the Guildford Borough Proposed Submission Local Plan (June 2016). I believe this Plan to be unsustainable, unworkable and, in many provisions, unnecessary.
Please find below my objections to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. There is a proposal in place to stop the bus that currently runs from Ripley to Guildford! Residents will have few options, but to be reliant on motor vehicles. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2586</th>
<th>Respondent:</th>
<th>15285345 / Mike Boughton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2694</th>
<th>Respondent: 15296289 / Angela Pope</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan as unsustainable.</td>
<td>The number of new houses of at least 13,860 new houses is not sustainable. The over-development will irrevocably damage local communities, especially Ripley, Send and Glandon. The local communities don't need these houses. Everyone will need to drive a car as Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services. The Plan has nothing to improve the infrastructure for Garlick's Arch.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2697</th>
<th>Respondent: 15296545 / Catherine Lees</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to this because of the deleterious effect it will have on tranquillity and charm of the villages of Ripley, Send and West Clandon. The sheer volume of houses proposed will place an enormous strain on the services and infrastructure of the surrounding villages. Such a development should be in an urban area where there are existing transport networks.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2717</th>
<th>Respondent: 15297217 / Elizabeth White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan as the development proposed is not sustainable.</td>
<td>13,860 new houses proposed is not sustainable, and not required by the local communities on which they are being inflicted. Many communities, especially Ripley, Send and Clandon would be damaged by over development. The nearest train stations to Wisley Airfield (A35) and Garlick's Arch (A43) are miles away and talk of new railway stations is fanciful. So most houses will have two cars - so another 30,000 cars in the borough! The Plan has nothing to improve the infrastructure for Garlick's Arch.</td>
<td></td>
</tr>
<tr>
<td>The development should be in urban areas where there is sustainable transport.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/2754</td>
<td>Respondent: 15298017 / Margaret Cousins</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to inappropriate and massive over development of sites such as Wisley Airfield and Gosden Hill Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2774</th>
<th>Respondent: 15298497 / John David Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
These are my main reasons/ I object on these grounds / …

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14206</th>
<th><strong>Respondent:</strong></th>
<th>15299201 / Samira Abdullah</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2807</th>
<th><strong>Respondent:</strong></th>
<th>15299361 / Jane Finlay</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I strongly object to the Local Plan which is unsustainable, flawed and I question the credibility of the report by Hearns as being an independent, non bias report.
General Comment on Policies

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

Comments on specific policies

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline. Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1 I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2836  Respondent: 15300385 / Mark Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2936  Respondent: 15304737 / Pamela Orthodoux  Agent:
1. I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Clandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development 'should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of 'sustainable development' is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long term impacts.

The policy states that it aims 'to secure development that secures the economic, social and environmental conditions in the area'. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as 'sustainable', in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy.

should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications 'wherever possible' and 'without delay' reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles.

These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3003  **Respondent:** 15312769 / Norah Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The traffic on the local roads and on the A3 are backed up ready every morning and evening, what will thousands of more cars do for this area?

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3020  **Respondent:** 15312961 / Alison Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

13,860 new houses proposed are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The traffic on the local roads and on the A3 is backed up ready every morning and evening, what will thousands of more cars do for this area?

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3041  **Respondent:** 15314305 / Andrew Dennis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is **not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3069  **Respondent:** 15314817 / Mr and Mrs Daniels  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

---

**Comment ID:** PSLPP16/3075  **Respondent:** 15315009 / Edward Dennis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

---
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3426  Respondent: 15320737 / Steven Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please confirm that you have received this response.

I object particularly to the proposed development at Garlick’s Arch and Gosden Hill Farm. The developments are out of proportion to the surrounding area and do not qualify for exceptional circumstances required to take them out of the Green Belt. In addition, I object to the planning policies as follows.

I object to POLICY S1 – Presumption in favour of sustainable development

- No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No statement of how economic, social and environmental impacts should be balanced.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3507  Respondent: 15321217 / Sally Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft local plan for the following reasons:

I moved into this area over 30 years ago because I wanted and chose to live in a proper village, with a thriving and sharing community and as I enjoy walking and spending time in nature, I chose this area for its green spaces and woodland

Since I have lived in the area, the traffic and congestion has increased, the school places have decreased, properties have been built in any spaces that can be found, there is a lack of parking, waiting time to see the local Doctor has increased, and pollution has increased

The limited consultation period was shocking. Do you really think ‘we’ the public, tax-payers realise what you are doing? Transparency is honesty …and we deserve that

With all the plans to build and therefore inviting more people to live ‘cheek by jowl’ in the local Green Belt, in massive developments, do you really think this will not impact our existing over-stretched infrastructure? Do you think that your new plans will be enough? They are not enough now, so, how do you think you can compensate and provide enough for everyone?
I object to the local plan as the development proposed is not sustainable (Policy S1)

The numbers of proposed housing will damage local communities especially Ripley, Send and Clandon. People drive cars as the bus service is limited and Clandon is the only village with a railway station. Where is the important infrastructure in the plan – perhaps building in urban areas would be more beneficial as they already have better infrastructure?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3140  Respondent: 15323041 / Jane Doherty  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3171  Respondent: 15323841 / Claire Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds.

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The new housing proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3252  Respondent: 15326465 / James Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds.

1. **I object to the Local Plan as the development proposed is not sustainable (Policy S1)**

The new housing proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/3301  **Respondent:** 15327905 / Julia Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY S1 – Presumption in favour of sustainable development**

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3158  Respondent: 15340929 / Claire Smylie  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

1. I OBJECT to the Local Plan as the development proposed will not be sustainable {Policy S1h}

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3780  Respondent: 15348033 / Peter Nicholas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to a number of aspects of the proposed Guildford Borough Local Plan, and set out below my specific comments;

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1).

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities through over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. In particular the existing road network will not be able to cope with the increased traffic that would be generated by the proposed development.

As a resident of West Clandon, I have particular concern about safety issues in the village. As you are aware, the main road through the village, being an A road already carries a great deal of through traffic and there seems to be no alternative to this. At various points, the road narrows so as to be only just wide enough for two cars to safely pass and not wide enough for a lorry (of which many pass through the village) and a car, let alone two lorries. As a result, lorries frequently mount the pavement. There is generally only a pavement on one side of the road, necessitating pedestrians to cross the road in a number of places. The traffic that would be generated by the proposed developments of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill will create traffic chaos in the village and undermine the safety of pedestrians and cyclists.
The balance of residential development between existing urban areas and Green Belt land is wrong. The policy of further retail development in Guildford centre is clearly misguided as retail sales steadily shift online. The North Street regeneration project has been proposed for many years already and has never happened. Why not? I think it is highly doubtful that the retail development proposed in the Plan can be financed and the project will languish for many more years. Meanwhile, there is demand for housing in the Borough and town centre residential locations are popular with the young and the old alike. If the proposed retail development in Guildford centre were curtailed, a few thousand more dwellings, a significant proportion of the number seen as needed in the Plan, could be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3824  Respondent: 15348481 / Donna Styles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3877  Respondent: 15349281 / Steve Aptel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13635  Respondent: 15349281 / Steve Aptel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3901  Respondent: 15349697 / Christine Hutchins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Local Plan as the development proposed is not sustainable.

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the local plan policy S1, the development planned is in no way sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4039  Respondent: 15352321 / Nick Wooff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially the beautiful areas of Chilworth and Shalford. The local communities don’t need these houses. Chilworth and Shalford have inadequate bus and train services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4153  Respondent: 15356801 / Clare Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1) The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4236  Respondent: 15358305 / Frances Hodgson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4284  Respondent: 15358753 / Adam Lewis  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) we object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops,
medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

5. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing and travel.

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

As follows here are my structured objections:

Policies S1 & S2: I object to these on grounds of unsustainability and disproportionally. The policy does not reflect the needs of local communities, yet the impact on affected areas will be such as to destroy the physical environments; e.g. villages such as Ripley, Send and Clandon. The absolute and relatively (respectively) isolated sites of Three Farms Meadow and Garlick's Arch are good examples of actual and pending unsustainability.
TFM has been refused Planning consent at least on two occasions by no less than 14 sustained objections, yet the developers are allowed to have another try because of the removal of the GB and a predetermination in favour of development; if that's not blinkered ideology pursuing something regardless of economic cost, I don't know what is!

No mention appears to be made of moderation of the overall figure of nearly 14,000 dwellings spread across the Borough, but mostly in the north where the three Wards of Lovelace face the greatest impact. The plan to build over 5,000 houses within five miles from Burpham to the M25 junction with the A3, represents a new town that will swamp old communities in situ.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4394  Respondent: 15367361 / Greg Ganjou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4425  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/4528  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

It seems to me that the plan is draconian in approach, whilst failing to absorb the previous genuine concerns of local residents regarding infrastructure and traffic problems. Furthermore, the plan seems to assume the annexation of Green Belt, contrary to Governmental stipulations

1. **POLICY S1**
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3107  Respondent: 15368993 / Tessa Spink  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4689  Respondent: 15371777 / Peter Thackery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4703  Respondent: 15372417 / P. Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a dear framework. Instead, no definition of "sustainable development" is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Thank you for reading this and I hope my views are I look I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially forward to your reply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S1 – Presumption in favour of sustainable development

GROUNDS FOR OBJECTION. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4845  Respondent: 15379969 / Teresa Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3195  Respondent: 15379969 / Teresa Britton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4927  Respondent: 15381089 / Tim Poyntz  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4974  **Respondent:** 15381441 / Gillian Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I consider the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Glandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car. I am already unable to park my car in Ripley for a short period to go shopping as all parking spaces (often including Ripley Green) are full. The parking area where White Hart Court used to be has been reduced and is always full. How can more cars help this situation?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4999  **Respondent:** 15382049 / Ian Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I consider the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is too many for this area. It will have a negative impact on villages such as Glandon, Send and my village Ripley. With no railway station in Send or Ripley, limited bus service, developments at Wisley Airfield and Garlick's Arch will require nearly all adults to own or use a car.

I am in charge of Glandon railway station which has 150 car park spaces. This car park is already regularly full on a working day (Monday to Friday). A number of these cars come from the Effingham Area where Effingham car park is smaller and always full Monday to Friday.

More concentrated development in this area will mean no where for these car owners to park, particularly should they want to travel to London by train.

Please consider my comments and I ask that the Plan is amended accordingly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5006</th>
<th>Respondent: 15382529 / Reuben Lee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5121</th>
<th>Respondent: 15385985 / Sally Almeida</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1) I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5125</th>
<th>Respondent: 15386017 / Gareth Sinnett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
</tbody>
</table>
Furthermore, the additional information below supports the need to scrap these plans:

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1 Sustainable Development

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both planmaking and decisionmaking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious longterm impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the prodevelopment bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by overdevelopment, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2781  Respondent: 15386017 / Gareth Sinnett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5144  Respondent: 15386337 / Edna Slater  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to
improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5184  **Respondent:** 15388673 / Bruce Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

### 1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across...
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2851  Respondent: 15388673 / Bruce Stewart  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5205  Respondent: 1538865 / Andrew Powell-Cullingford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Objection to Guildford Borough Proposed Submission Local Plan (June 2016)

I object to this revised Local Plan 2016 as being unsound and not fit for purpose for the reasons listed below:

1. I object to the Local Plan as the volume of development proposed is not sustainable (Policy S1)

I object to the overall provision of nearly 14,000 homes over a period of 15 years. The annual figure of 693 homes is too high and makes no reference to the constraints that can be applied to the OAN in respect of the fact that 89% of the Borough is in the GreenBelt. A figure of approximately 200 homes per annum would be far more achievable and sustainable without the need to build on Greenbelt land and instead to utilise brown field sites in more established urban areas with good public transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/7846  Respondent: 15388865 / Andrew Powell-Cullingford  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the volume of development proposed is not sustainable.

I object to the overall provision of nearly 14,000 homes over a period of 15 years. The annual figure of 693 homes is too high and makes no reference to the constraints that can be applied to the OAN in respect of the fact that 89% of the Borough is in the Green Belt. A figure of approximately 200 homes per annum would be far more achievable and sustainable without the need to build on Green belt land and instead to utilise brown field sites in more established urban areas with good public transport links.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5301  Respondent: 15389697 / Oliver Stewart  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5333  Respondent: 15390337 / Daniel Smith  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The plan will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5351  Respondent: 15390401 / William Stewart  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5382  Respondent: 15390785 / Francesca Molossi-Murphy  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5429  Respondent: 15397953 / Gillian Dobson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is **not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable - it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1) The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3174  Respondent: 15398657 / Kim Roberts  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5493  Respondent: 15399041 / Sue Ely  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages.
are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clondon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5543  Respondent: 15400385 / Robert Bonnar  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5643  Respondent: 15405857 / Raymond Mackay  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was born and grew up, until the age of 24, in the Guildford area. Having moved to London to work in recent years I have always considered Guildford and particularly Clandon to be an area I would like to return to raise a family. These plans would fundamentally change my view of Guildford and the surrounding areas. In addition, my parents still live in West Clandon and I therefore have a strong vested interest in the proposed plans.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5704  Respondent: 15406529 / David I Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

With the proposed development coming within 400m of my property, I am acutely aware of the destruction, the increased noise, pollution and damage this development will have to the local habitat. This will perhaps, affect me more than most but all residents in Send, Clandon and Ripley will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5986</th>
<th><strong>Respondent:</strong></th>
<th>15420833 / Marjorie Moss</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable.

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF's most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6053  Respondent: 15422529 / David Roberts  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6086  **Respondent:** 15422849 / Ryan Clarke and Lauren Emberson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **I object to the Local Plan as the development proposed is not sustainable (Policy S1)**
   13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

   The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing as they become commercially non-viable. Residents will be reliant on motor vehicles for almost all leisure, shopping and commuting journeys. These sites are unsuitable due to being unable to access sustainable public transport. Furthermore, there are no plans to improve the transportation infrastructure for Garlick's Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further traffic loading will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

5. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

We specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) we object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops,
medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6198</th>
<th>Respondent: 15426305 / I C Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

POLICIES

Many of the “blue box” policy statements are vague and general and incapable of providing guidance for planning decisions. The accompanying text is essential to understanding and adds much detail but its status is apparently not that of “policy”. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself

POLICY S1 – Presumption in favour of sustainable development

I object to this policy.

Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection when making local planning decisions are given. However, apparently, all incursions into the Green Belt constitute “sustainable development”. It is clear that economic growth is the overriding factor and the policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6203</th>
<th>Respondent: 15426369 / Harvey West</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable {policy -S1}and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6229  Respondent: 15426657 / Jean Birkby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6232  Respondent: 15426721 / S Mayersbeth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6254  Respondent: 15427617 / Ken Scotland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My detailed objections are listed below.

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016). In my opinion the Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The National Planning Policy Framework (NPPF) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to rely on motor vehicles. These sites are also unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6286</th>
<th>Respondent: 15427969 / Chris Mealing</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 draft local plan for the following reasons:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6320</th>
<th>Respondent: 15428225 / Vian Lee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6391</th>
<th>Respondent: 15430369 / Sarah Long</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/6392</td>
<td>Respondent: 15430433 / Simon Greenhill</td>
<td>Agent:</td>
</tr>
<tr>
<td>----------------------------</td>
<td>----------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, <strong>is Sound? ( )</strong>, <strong>is Legally Compliant? ( )</strong></td>
<td>I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6394</th>
<th>Respondent: 15430497 / Martin Chalk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, <strong>is Sound? ( )</strong>, <strong>is Legally Compliant? ( )</strong></td>
<td>I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6562</th>
<th>Respondent: 15434241 / Valerie Sowerby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, <strong>is Sound? ( )</strong>, <strong>is Legally Compliant? ( )</strong></td>
<td>I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1 I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6719</th>
<th>Respondent: 15437505 / Terri Smart</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

**Sites - S1**

I OBJECT to the random Settlement Boundary which has been imposed our village, East Clandon, without any consultation of any kind or to explain the likely impact of such a boundary on this 900 year old village. As stated earlier Policy H3 proposes Rural Exception Homes could proliferate on the borders of this area which would not be appropriate for this conservation area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6873</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as a whole as it does not meet the needs of local communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10650</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Draft Local Plan as a whole as I believe that it is not sustainabl (Policy S1) For example, no railway station within easy walking distance of Wisley Airfield and Garlick's Arch, poor bus services which are proposed to be reduced, lack of utility infrastructure at Garlick's Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10668</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object to the Local Plan as a whole as it does not meet the needs of local communiti(Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6772  Respondent: 15438945 / Jacqueline Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to POLICY S1 – Presumption in favour of sustainable development

• No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No statement of how economic, social and environmental impacts should be balanced.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6813  Respondent: 15439425 / Abigail Cruse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

NPP states that the purpose of the planning system is to contribute to the achievement of sustainable development.

This development of over 13,500 homes during the Plan period is not sustainable and will have a permanently detrimental impact by over development of villages in particular between Guildford and the M25 including Ripley, Send & Clandon. The services in these villages are not adequate to cope with the levels of development proposed and these developments do not meet with the needs of the local communities.

Garlicks Arch (A43) and Wisley Airfield (A35) are in unsustainable locations with a total lack of sustainable transport - bus services are infrequent and routes have been reduced, no railway stations within walking distance leaving residents reliant upon cars. There are no plans to improve the infrastructure for Garlicks Arch within the infrastructure plan and once again residents will be reliant on the car. These developments should be considered in areas such as Guildford where sustainable transport can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6885  Respondent: 15440353 / Alison Boyce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7094  Respondent: 15442721 / Elizabeth Robson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object to the presumption in favour of sustainable development:

- It does not take into account the particular characteristics of villages and rural areas with limited transport and services available
- The term is too subjective and unclear to represent a policy
- The primary policy should be to protect the Green belt as it currently is for future generations.
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The National Planning Policy Framework (NPPF) states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to rely on motor vehicles. These sites are also unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for
Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7217  Respondent: 15445793 / Jackie Withers  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7262  Respondent: 15446145 / Nigel & Jane Simpson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand. congestion on the A3 in particular, but also other A roads in the area such
as the A247 and the A246. There is already an overcrowded and slow train system for those living in the Borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

1. Continuing the S1 Policy (presumption in favour of sustainable development), we object that this is not being met and that Guildford Borough Council are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools etc, in our immediate area (other than roads and rail already mentioned above) to service us. If Guildford Borough Council were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hopeful goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? There are many examples of developers reneging on commitments as funds dry up, even though very high profits will be made as a result of agricultural and greenbelt land being sold for valuable housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14355  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7279  Respondent: 15446753 / David Boyce  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set have out below my objection to particular policies and issues within the Plan.

1. I object to the Local Plan as the proposed development will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable as it will have a permanent and detrimental impact on the existing local community particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development and the proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations as they do not benefit from railway stations within easy walking distance and bus services are inadequate. Residents will have to rely on cars. These sites are unsuitable due to the lack of public transport. There are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. GBC should consider increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7290  **Respondent:** 15447777 / Maggie Kalupka  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10775  **Respondent:** 15448289 / Paul Miller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7358  **Respondent:** 15448321 / Nicole Mapplebeck  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7359  Respondent: 15448353 / Emily Roberts  Agent:

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2992</th>
<th>Respondent:</th>
<th>15448385 / Edward Bates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>( )</th>
<th>is Sound?</th>
<th>( )</th>
<th>is Legally Compliant?</th>
<th>( )</th>
</tr>
</thead>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/7362</th>
<th>Respondent:</th>
<th>15448449 / Carol Roberts</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>( )</th>
<th>is Sound?</th>
<th>( )</th>
<th>is Legally Compliant?</th>
<th>( )</th>
</tr>
</thead>
</table>

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Our Environment - improving sustainability and protecting our countryside, balancing this with the needs of the rural and wider economy – this proposal decreases sustainability locally, and destroys valuable rural amenities while not evidencing any benefits to the wider economy.

The plan promises to ‘support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character. This proposal does not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7519</th>
<th>Respondent: 15449889 / Harriet Bell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7607</th>
<th>Respondent: 15450785 / Georgina Love</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1) The volume of houses proposed is not sustainable and will overdevelop the local villages of Ripley, Send and Clandon. The additional housing is not needed by the local area and the infrastructure is not there with no railway infrastructure for Wisley and Garlick's arch. The roads are already impacted by heavy traffic and will not be able to sustain the additional cars required.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7617</th>
<th>Respondent: 15450817 / Audrey Gachen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to POLICY S1 – Presumption in favour of sustainable development</td>
<td></td>
</tr>
</tbody>
</table>
• No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No statement of how economic, social and environmental impacts should be balanced.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7675  Respondent: 15451009 / Michael Love  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)
The volume of houses proposed in the Plan is just not sustainable and will overdevelop the local villages of Ripley, Send and Clandon. The additional housing is not needed by the local area and the infrastructure is not set up to cope. For example, there is no railway infrastructure for Wisley and Garlick's Arch. The roads are already impacted by heavy amounts of traffic and will not be able to sustain the additional vehicles required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7683  Respondent: 15451041 / Iain Bell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable (Policy S1)
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7692  Respondent: 15451201 / I Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. The development proposed is not sustainable (Policy S1)

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. We don't need these houses. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU and may reduce the demand for new housing in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7696  Respondent: 15451457 / Camilla Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7714  Respondent: 15451713 / Gaby Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7889  Respondent: 15454657 / Tracy McGuigan  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7888  Respondent: 15454689 / Dave Herbert  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7887  Respondent: 15454785 / Fiona Hodges  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7884  Respondent: 15454849 / Charlotte Murphy  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The proposed construction of approximately 13,860 new houses will have negative impact on local communities by over development, especially Ripley, Send and Clandon. Therefore the proposed development is untenable and practicably unsustainable. Interestingly, there appears to be no infrastructure improvement plan for Garlick’s Arch. Currently there is no rail infrastructure that supports Garlicks Arch (A43) or Wisley Airfield (A35) and current bus service coverage is found to be inadequate. This lack of public transport will result in greater car traffic as most adults will require vehicular access.

The development of more urban areas and other brownfield sites makes far more sense in terms of sustainable transport resuse of ‘brown’ sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7878</th>
<th>Respondent: 15455009 / Emma Graham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7877</th>
<th>Respondent: 15455073 / Amanda Fletcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7876</th>
<th>Respondent: 15455105 / Kate Robinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7890</th>
<th>Respondent: 15455201 / Edith Dadswell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7855  Respondent: 15455233 / Andrew Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages are currently barely able to cope and I therefore cannot understand how they can be expected to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from any railway stations within easy walking distance and the local bus services are already inadequate. Residents will have no option but to be reliant on motor vehicles. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from severe congestion. Further vehicle movements will result in even more acute congestion and potential grid-lock and hence much greater risks from pollution created by stationary cars. The health of residents and the local environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7980  Respondent: 15457505 / Julie Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is apparent that the principles of the NPPF have not been adhered to. There is no clear definition of Sustainable development which councilors can work with. There is no joined up thinking or strategy between plan making and decision taking and references to sustainability are so vague that the NPPF presumption in favor of sustainable development becomes a presumption in favor of any development at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8896</th>
<th>Respondent: 15460353 / Elizabeth Hewlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1) 13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve infrastructure for Garlick’s Arch.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17351</th>
<th>Respondent: 15460737 / Donna Collinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S1: Presumption in favour of sustainable development</td>
<td></td>
<td></td>
</tr>
<tr>
<td>We appreciate that this is model wording. However, experience since this was first produced now shows that this wording is inadequate to communicate accurately to users of the Plan: 1) the concept of sustainable development including the five guiding principles 2) the policies in the NPPF as a vehicle for achieving sustainable development 3) the positive presumption in favour of sustainable development,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>While fully appreciating that it is important the Local Plan does not duplicate the NPPF, the reasoned justification could usefully clarify the three components of policy S1.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Object: inadequate, unclear</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8127</th>
<th>Respondent: 15461633 / Anna Wood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/8178  **Respondent:** 15462017 / Kevin Rhoades  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). These are my main reasons/ I object on these grounds / …

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The damage to local communities of Ripley, Send & Clandon that development of 13,860 new houses proposed is serious. Local communities do not need these houses and the Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/8208  **Respondent:** 15462337 / Shirley Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford is a gap town but constraints to the overall housing target have not been applied

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/8250  **Respondent:** 15462785 / Thomas McMinn  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016) I OBJECT in the strongest possible terms to the Guildford Borough Proposed
Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8499  Respondent: 15468609 / Lesley Lane  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8511  Respondent: 15468801 / Lynne Moore  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I have known and visited the Ripley area for 40 years and object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016) on the following grounds.

1. **The development proposed is not sustainable (Policy S1)**

13,860 new houses will damage local communities by over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services and the local roads will not be able to cope with the additional traffic. The Plan has nothing to improve the infrastructure for the Garlick's Arch area. The Plan takes no account of the effects of the recent referendum which rejected UK membership of the EU any may reduce the demand for new housing in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send, and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send, and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8615  Respondent: 15471489 / P Gilby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed will not be sustainable

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanent detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send, and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not have railway stations within easy walking distance and bus services across rural villages are few and far between. Greater consideration should be given to increasing the density of development in urban areas, like Guildford, where more practical sustainable transport is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8594  Respondent: 15472097 / Bernard Eyre  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan. Please send me written confirmation that you have received this correspondence by writing to my address above.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8655</th>
<th>Respondent: 15474849 / Timothy Yorath</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing.

Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3201  Respondent: 15474849 / Timothy Yorath  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8699</th>
<th>Respondent: 15475041 / Anne Geary</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8724</th>
<th>Respondent: 15475297 / Jane Patricia Chandler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8754</th>
<th>Respondent: 15475649 / Joanne Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to Policy S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable homes. There is only one small shop, no post office and only limited bus service in the village - it would not be able to sustain development suggested in the proposed local plan. Developing additional homes would adversely and completely change the character of the village. The proposals are unsustainable in terms of public transport, parking, shops, schooling, drainage, road capacity, pollution and noise. There is no proof that so many houses are needed. There doesn't seem to be any consideration for access to essential facilities in the policies. There is no clear consideration of schooling in the area. Schools are mentioned in the Definitions under Policy I1 Infrastructure and Delivery but no concrete plans are included to accommodate the increased population and pressure on infrastructure the proposals would bring. In Policy I1 under Definitions, road and transport infrastructure are mentioned but no detail has been provided for West Horsley in any of the Local Plan documents, including the infrastructure Delivery Plan and yet huge areas of West Horsley are being proposed for development, without due consideration of the impacts on the village. In addition West Horsley has not been mentioned in the Local Plan with regards to waste water infrastructure - again, development proposed and no plan to accommodate it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8772    Respondent: 15476289 / Gregory Heffer    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will require a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8905    Respondent: 15478017 / Kirstie Pankhurst    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable
Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8957  Respondent: 15478177 / Michelle Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the...
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15890  Respondent: 15478209 / Sally Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9880  **Respondent:** 15479681 / George Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9254  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of...
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9482</th>
<th>Respondent: 15482817 / C.E. Pullen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</td>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9491  Respondent: 15482977 / Craig Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. This policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development and is therefore unsustainable. This should represent an absolute constraint on development.

Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting a clear boundary to planning decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9500  Respondent: 15483009 / S Acomb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages...
are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9620  Respondent: 15484033 / Caroline Ali  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft local plan for the following reasons:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9677  Respondent: 15485281 / Fiona Stobart  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9690</th>
<th>Respondent: 15485345 / Ruth Beavington</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td><strong>I object to the local plan as the development proposed is not sustainable (Policy S1)</strong></td>
<td><strong>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</strong></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9713</th>
<th>Respondent: 15485473 / Eilish Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>1. The development proposed is not sustainable (Policy S1)</td>
<td>13,860 new houses proposed is not sustainable – it will damage local communities by over development. There is a certain charm about the area and the surrounding area which will be destroyed with the development of new houses. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every household will have to have a car, if not a few more. The Plan contains nothing to improve the infrastructure for Garlick’s Arch. This will have a knock on effect to all surrounding roads.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9734</th>
<th>Respondent: 15485601 / Tim Jewers</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>1. I object to the Local Plan's aim to impose massive new towns at 'strategic’ sites. I am not against development but I would prefer that each existing town / village provide the numbers of homes required in ratio to their size. This is an organic and far more sustainable way of growth.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/9809 | Respondent: 15486081 / Rosie Ainsworth | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9906  **Respondent:** 15486881 / Mark Langton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9906  **Respondent:** 15486913 / Sarah Langton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9904  **Respondent:** 15486945 / J Hazelton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9862  **Respondent:** 15486977 / P Jefferson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9870  Respondent: 15487009 / Yvonne Peyton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9871  Respondent: 15487041 / S Comfy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9876  Respondent: 15487105 / Keith Pew  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9877</th>
<th>Respondent: 15487137 / P Doherty</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9878</th>
<th>Respondent: 15487169 / Emily Wigfall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9879</th>
<th>Respondent: 15487201 / Samantha Dale</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9884</th>
<th>Respondent: 15487233 / Lindsey Schravetta</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9888</th>
<th>Respondent: 15487361 / Roger Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9890</th>
<th>Respondent: 15487393 / Nicola Ford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9892</th>
<th>Respondent: 15487425 / B Pryor</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9894</th>
<th>Respondent: 15487457 / Aidan Beckett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9895</th>
<th>Respondent: 15487489 / Luke Draper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9899</th>
<th>Respondent: 15487521 / A Malcmer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9896</th>
<th>Respondent: 15487553 / Nicholas Eager</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed number of 13,860 new houses in the area of Ripley, Send and Glandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring more cars to the area as most households have more than one vehicle.

The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be relocated to urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9916  Respondent: 15488065 / Heather Beaver  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9930  Respondent: 15488193 / Tracey Butler  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9947  Respondent: 15494977 / Carol Adams  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon
<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP169953</td>
<td>Viliv Viana</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP169965</td>
<td>Harriet Philips</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP169984</td>
<td>Daniel Perkin</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP169988</td>
<td>Therese Elizabeth Hill</td>
<td></td>
</tr>
<tr>
<td>Document</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9992  Respondent: 15495393 / M Rendell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9993  Respondent: 15495457 / R Laroche  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9994  Respondent: 15495489 / Stephen Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10022</th>
<th>Respondent: 15495841 / Nicholas Fox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Presumption in Favour of Sustainable Development: I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create new towns of approx. 2,000 houses. These new towns are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes on-site, as does Dickens Heath, Solihull, on which the GBC Pegasus report was based.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10023</th>
<th>Respondent: 15495873 / Gerard Duvé</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10037</th>
<th>Respondent: 15495905 / Emma Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.
Comment ID: PSLPP16/10054  Respondent: 15495937 / C Aruncel  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10062  Respondent: 15495969 / Olivia Doyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10069  Respondent: 15496001 / Ryan Hookind  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10076  Respondent: 15496033 / Sophie Hart  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/10085  **Respondent:** 15496129 / Ella Doyle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/10104  **Respondent:** 15496193 / Oliver Hemmings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/10105  **Respondent:** 15496225 / Tasha Hemmings  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/10319</th>
<th>Respondent:  15496225 / Tasha Hemmings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/10106</th>
<th>Respondent:  15496289 / W.A. McGregor</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/10109</th>
<th>Respondent:  15496353 / P.J. McGregor</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/10112</th>
<th>Respondent:  15496385 / Paul Bold</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10113  Respondent: 15496481 / R Frampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10114  Respondent: 15496545 / Gillian Frampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10116  Respondent: 15496609 / Dena Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10122</th>
<th>Respondent: 15496929 / M Cozens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsely and West Clandon.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10129</th>
<th>Respondent: 15496961 / Felix Jeffreson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10124</th>
<th>Respondent: 15496993 / nigel stirraker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10127</th>
<th>Respondent: 15497057 / S McMarken</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the local plan as the proposal of 13,860 homes proposed will not be sustainable and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10140  Respondent: 15497377 / David Freeborough  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10144  Respondent: 15497441 / Holly Hicks  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10148  Respondent: 15497505 / Jyoti Nanda  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10232  Respondent: 15498369 / Kris Steadman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10246  Respondent: 15498785 / Catherine Elingworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10256  Respondent: 15499297 / Alex Mundy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wasobject to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10265</th>
<th>Respondent: 15499873 / Pan Illingworth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10275</th>
<th>Respondent: 15500065 / Rachael Illingworth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10274</th>
<th>Respondent: 15500161 / Joanna Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley (where my family live), Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. I do not believe the proposed developments meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Gartick's Arch (A43) are in unsustainable locations. We do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on cars. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Gartick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Surely greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. I know this as we have to use them daily. At the slightest issue on the A3 traffic queues outside our house using it as a cut through. Stationary engines running. Noise and pollution increasing. Further vehicle movements will result in even more acute congestion and greater pollution. My family and other residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

Comment ID: PSLPP16/10299  Respondent: 15501217 / Luke Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/10308  Respondent: 15501313 / Matthew Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/10315  Respondent: 15502113 / Paul Gaffikin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/10321  Respondent: 15502177 / Steve Plewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10399  Respondent: 15502209 / Shirley Atkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable.

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, PoliW 51 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy 51 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development,

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to this Policy as the development proposed will not be sustainable.

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, PoliW 51 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF's most important guideline.

Policy 51 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development,

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10349</th>
<th>Respondent: 15502817 / Linda Margaret Cutbush</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
<td>13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10362</th>
<th>Respondent: 15502977 / Alexandra Morton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10377</th>
<th>Respondent: 15503105 / Beam Evans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10393  Respondent: 15503169 / A Palitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10404  Respondent: 15503361 / James Pasfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10401  Respondent: 15503457 / Patrick Lea  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10420  Respondent: 15503585 / B Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10436  Respondent: 15503617 / Stephen Roy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10448  Respondent: 15503649 / N Ord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10452  Respondent: 15503777 / Elya Koudou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10461  Respondent: 15503809 / M Pratt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the 2016 revised Local Plan as the development proposed is not sustainable (Policy S1) – this is a seemingly ill thought through, last minute document, and not in line with your local government election manifesto: the inclusion of Garlick’s Arch is indicative of your disregard for those residents who elected you in response to now, your worthless promises. As a document, it cannot be thought of as a considered set of proposals following the rejection of plans put forward by your corrupt predecessors. You can do better using existing brown fields sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10501  Respondent: 15504001 / Margaret Banks  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10691  Respondent: 15504929 / William Scott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley (where I live), Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. I do not believe the proposed developments meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. We do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. I know this because I can't drive yet and rely on lifts and public transport.

Residents will have few options, but to be reliant on cars. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Surely greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. I know this as I have to use them daily. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10729  Respondent: 15505377 / Simon Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10733  Respondent: 15505409 / Ian Cunningham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10737  
Respondent: 15505537 / Vincent Carley  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10744  
Respondent: 15505601 / Emma Robson  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10753  
Respondent: 15505761 / James McMarken  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10754  Respondent: 15505793 / Edward Goddard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10767  Respondent: 15505921 / Andrew Forest  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10771  Respondent: 15506017 / Steven Ponsford  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10776  Respondent: 15506049 / Mandy Shoesmith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10774</th>
<th>Respondent: 15506081 / Dale Miller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10785</th>
<th>Respondent: 15506113 / Sheila Taylor</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10797</th>
<th>Respondent: 15506177 / Jean Calas-Hathaway</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10808  **Respondent:** 15506465 / Lisa Garner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10824  **Respondent:** 15506625 / Ian Toft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10865  **Respondent:** 15506657 / Teresa Laroche  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10892  Respondent: 15507329 / Manner Kaur  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10896  Respondent: 15507457 / Andre Rose  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10900  Respondent: 15507489 / K Garner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to the Local Plan as the development proposed is not sustainable (Policy S1) 13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The development should be in urban areas where there is sustainable transport. 1. I object to the Local Plan as the development proposed is not sustainable (Policy S1) 13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch. The development should be in urban areas where there is sustainable transport.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10948</th>
<th>Respondent: 15507585 / Patrick Laroche</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/10969</td>
<td><strong>Respondent:</strong> 15507617 / Ewan Collens</td>
<td><strong>Agent:</strong></td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Attached documents: | |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10974</th>
<th><strong>Respondent:</strong> 15507713 / Yvonne Connolly</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Attached documents: | |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10975</th>
<th><strong>Respondent:</strong> 15507745 / M Grainger</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Attached documents: | |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10976</th>
<th><strong>Respondent:</strong> 15507777 / George Smion</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Attached documents: | |
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10980</th>
<th>Respondent: 15507905 / Hannah Lewis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10981</th>
<th>Respondent: 15507969 / Ian Draper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10984</th>
<th>Respondent: 15508001 / Lisa Barwick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10991</th>
<th>Respondent: 15508033 / D Worship</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10997  Respondent: 15508065 / Christina Worship  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy Sl) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11069  Respondent: 15509057 / Richard Golding  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S1 Presumption in favour of Sustainable Development.

I object, the proposals in this policy have totally ignored the most SUSTAINABLE item we have been given, THE GREEN BELT, the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The contempt for Green Belt constraints was amply demonstrated by councilor Spooner at the open meeting in Send when he said its only green belt not an Area of Outstanding Natural Beauty when a query was raised by one of the members of the public present.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s is just a developers charter and one can be sure that any development will be heavily biased towards large properties 4/5 bedrooms as has been shown by the small amount of redevelopment which has already occurred in Send. This develops at all cost. With the references to sustainability being so vague that the NPPF the presumption in favour of sustainable development becomes a presumption in favour of any development at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11234  Respondent: 15570145 / Owen Eszeki  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create new towns of approx. 2,000 houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11238  Respondent: 15570209 / Emily Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create new towns of approx. 2,000 houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11253  Respondent: 15570273 / Barnaby Geib  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11305  Respondent: 15570305 / Richard Gray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2795  Respondent: 15570817 / Tom Edelsten  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15271  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11431  Respondent: 15571425 / Monika Neczaj  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11478  Respondent: 15571553 / Darren Carbine  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S1 – Presumption in favour of sustainable development - I OBJECT.

At the top of the draft plan, Policy S1 ought to set a clear framework. Instead, there are no definitions of “sustainable development” given. Furthermore the policy fails to set out any principles for applying sustainable development in practice to local planning decisions. The worst gap in Policy S1 is the Green Belt. Enshrined in primary legislation to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections,

In my personal opinion Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11507  Respondent: 15571617 / Bruce Garbutt  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that the development proposed will not be sustainable - Policy S1

The development of 13,860 homes during the Plan period is not It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon.

The services in these villages will be unable to cope with the level of development The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations offering little option but to use cars for all transport (with the possible exception of Gosden Hill (IF a new railway station actually materialises).

Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Residents will be reliant on the car for transport. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already
suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/11770  **Respondent:** 15571617 / Bruce Garbutt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

**POLICY S1 – Presumption in favour of sustainable development**

I object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/11515  **Respondent:** 15571681 / Anne Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The large number of new houses proposed is not sustainable – it will damage local communities by over development,
especially Ripley, Send and Cland and very much change the rural character of these villages as well as increasing road traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11526  Respondent: 15571745 / Hazel Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The volume and location of homes proposed is not sustainable. It will have a detrimental effect on the environment and existing communities. The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. This will further increase the number of cars and associated congestion in the area. The plan does not propose adequate infrastructure and road provision to accommodate the unnecessarily large number of homes to be built. There are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11568  Respondent: 15571937 / S Bennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/3147  **Respondent:** 15571937 / S Bennell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11617  **Respondent:** 15572641 / Susan Palmer  **Agent:**
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The development of thousands of homes in the villages to the north of Guildford is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable infrastructure can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11665  Respondent: 15573921 / Carolyne Jackson  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11732  Respondent: 15574337 / Jacqueline Redknap  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages.
are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11798  Respondent: 15574945 / Tim Crook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11812  Respondent: 15575009 / Tony Redknap  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1) The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion, safety for pedestrians and cyclists in particular and greater pollution. Residents, health and safety and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12180   Respondent: 15581665 / Laura Daboo   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/12183  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The
policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from too often severe congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12296  Respondent: 15582337 / Peter Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

i object to the local plan as the development proposed is not sustainable (policy s1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the local plan as the developments proposed are not sustainable (Policy S1).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12494  Respondent: 15583809 / Nigel Stephenson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is clearly unsustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. These local communities do not need any more houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will of course have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch at all

The development should be in urban areas where there is a measure of sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12520  Respondent: 15584001 / Lorna Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12555  Respondent: 15584161 / Alexandra Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12584  **Respondent:** 15584481 / Jeremy Hamilton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the local plan as the development proposed is not sustainable (Policy S1)
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12617</th>
<th>Respondent: 15584641 / Miriam Gilkerson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15662</th>
<th>Respondent: 15584641 / Miriam Gilkerson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>- I object to the local plan as I do not believe the proposed development (policy S1) is sustainable</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12633</th>
<th>Respondent: 15584833 / Maria Fort</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>- I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12648  Respondent: 15584961 / Helen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1 POLICY S1

I object to Policy S1 as the development proposed will not be sustainable, The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. Instead, there is no definition of “sustainable development”. The policy fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Guildford Borough Planning Department are already well aware of multiple previous applications for planning permission for a large number of houses made by Philip Christian of Stonehaven homes on a 5 acre strip of Green Belt at Barn End , The Street , West Clandon. The land is of environmental significance as this provides a green wildlife corridor adjacent to protected woodland. In the past every application has been refused locally and on Appeal but that position will be much harder to sustain under the proposed Policy S1. I have seen Surveyors on the site in the last week presumably carrying out the planning work for the next planning application by Mr Christian for submission if this Local Plan comes into force.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The utility services in these villages will not be able to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations from the point of view of access to public transport links with local bus services at best infrequent (with 2 hour gaps between buses) and local bus services are constantly reducing. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will have few options, but to be reliant on cars. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options already exist.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion and frequent accidents on the Street due to the narrow width of the road at several pinch points. Further vehicle movements will result in even more acute congestion, greater pollution and likely increase in accidents. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12693</th>
<th>Respondent: 15585281 / Val Woodland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development proposed is not sustainable (Policy S1). The number of houses to be built per year is too high. The building should only be started when the infrastructure needed to serve the future residents is in place. The local schools and surgery are at full capacity already.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15939</th>
<th>Respondent: 15585345 / Wanita Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12719  Respondent: 15585409 / Vanessa Styles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO – the local plan as the proposed development is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12722  Respondent: 15585441 / Laurie Will  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12759  Respondent: 15585601 / Sophie Corstin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although I am no longer a resident in the GBC area, I am a regular visitor to my parent’s home in East Clandon and consider my objections are valid.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S1 SUSTAINABLE DEVELOPMENT

I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development ‘should be seen as a golden thread running through both plan-making and decision-taking.’ Policy S1 ought to set a clear framework. No definition of sustainable development’ is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise ‘to secure development that secures the economic, social and environmental conditions in the area’ omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as ‘sustainable’, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications ‘wherever possible’ and ‘without delay’ reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don't need these houses. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The number of houses planned will damage local communities through over development, especially Ripley, Send and Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, which was exemplified by my sons’ being unable to rely on buses to get into school on time. This means each adult will have to use a car, which will put a large number of extra cars on an already overcrowded and inadequate road infrastructure (see 3 below), which the plan does not appear to be addressing around Garlick's Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13200  Respondent: 15588929 / Alex Hutchings  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13282  Respondent: 15589665 / Anna Worsley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13305  Respondent: 15589857 / Louise Herbert  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure, which does not even cope with current demand. There is already significant congestion on the A3 in particular, and also other ‘A’ roads in the area such as the A247 and the A246. There is already an overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems, which will be much exacerbated by large increases in housing.

I specifically draw to your attention the winding, narrow, dangerous and congested route via the A247 through West Clandon, which then encourages drivers to seek and use the even narrower rural Ripley Road, through East Clandon, to and from the A3. This will be much exacerbated with the proposed large increase in housing resulting in associated large increases in cars and travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13307  Respondent: 15589857 / Louise Herbert  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Continuing with Policy S1 (Presumption in favour of Sustainable Development)

I object to the Plan on the basis that this Policy is not being adhered to. It is clear that there are no fixed plans to improve the provision of services. If GBC is serious about improving the infrastructure and sustainability of our communities, it would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

I object to the fact that GBC has not met the requirements of the NPPF Paragraph 155, which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. Here in East Clandon, we have not had a meaningful consultation on imposing a settlement boundary on East Clandon, nor have we been consulted on meaningful economic and population growth figures for Guildford showing various projections with high, medium and low growth scenarios.

There should be a significant challenge and review of GBC scenario planning with the housing and growth numbers revised, especially in the light of uncertainty and change, which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13300  Respondent: 15589889 / Keith Macdonald  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, especially for the villages between Guildford and the M25, including Ripley, Send and West Clandon. Not only will the services in these villages be unable to cope with the level of development proposed, the proposed developments themselves do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are constantly being reduced. Residents will have no option but to rely on their cars. These sites are totally unsuitable due to being unable to access sustainable transport. Furthermore, the Infrastructure Plan shows no plans to improve the infrastructure for Garlick's Arch. Residents will have to rely on their cars for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical and sustainable transport options can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13355  
Respondent: 15590241 / Claire Tallis  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are my main reasons/ I object on these grounds / …

1. **I object to the Local Plan as the development proposed is not sustainable** (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13366  
Respondent: 15590273 / Eunja Madge  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

**POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECTION to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13622  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13720  Respondent: 15594817 / Toni Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13779  Respondent: 15595553 / Carol Davis  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan Policy S1

The Local Plan proposed is not sustainable. The National Planning Policy states that the planning system should contribute to the achievement of sustainable development. The proposed development of 13,860 houses during the period of the plan is just not sustainable. The impact on the local communities, namely the villages north of Guildford, would be disastrous as they would not be able to cope with the proposed level of development. The needs of these local communities have been completely ignored in this Plan.

Site A35 at Wisley Airfield and site A43 Garlick's Arch are positioned in locations with no public transport - already overcrowded railways are a drive away and bus services are very limited. Therefore these sites would be unable to access sustainable transport and would rely totally on the use of cars. There is already major congestion in these areas and concern over air pollution and this would be exacerbated. Development should take place in urban areas where sustainable transport options can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13793  Respondent: 15595681 / Willemien Downes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I Object to the Local Plan, as it is simply not sustainable - (Policy S1)

Over-development of our area will heavily impact Ripley, Send and Clandon, due to the sheer number of houses proposed - (13,860). Both Garlick's Arch (A43) and the old Wisley Airfield (A35) have no accessible train stations as well as inadequate local bus services. It is therefore inevitable that there will be many more cars used in the area. Additionally, the Plan contains nothing that will improve infrastructure to improve Garlick’s Arch. It therefore makes more sense for this development to be sited in urban areas where sustainable transport links are already in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14081  Respondent: 15601121 / Elspeth Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact upon existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are already few and far between so residents will have to be using their cars. These sites are just unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, particularly Ripley High Street which already suffers mile long tailbacks at peak times. More cars of the road will mean even worse acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14109  Respondent: 15601185 / Jane Young  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[Text]

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14237  Respondent: 15601761 / Georgina Korrison  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[Text]

The 13,860 extra houses is not sustainable, my village of Ripley and local villages of Send and Clandon will be damaged, we don’t need these extra houses in our local area. The plan lacks any infrastructure improvements for Garlicks Arch. This development must surely be more suited to an urban area with transport already on hand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14252  Respondent: 15601953 / Stephen Yandle  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14281</th>
<th>Respondent: 15602113 / Janet Woodward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the local plan as the development proposed is not sustainable. (POLICY S1) • No guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy and no commitment to protecting it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14303</th>
<th>Respondent: 15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-
development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14394  **Respondent:** 15602561 / Jonathan Clark  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/16477  **Respondent:** 15603297 / Rony Douek  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the Local plan being proposed for Guilford in 2016 for the following reasons, which I know are shared by many local residents:

- I object to the local plan as the development proposed is not sustainable (Policy S1). In particular, the volume of proposed housing will very clearly damage local communities especially in Ripley and Send and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. I have a particular concern about the lack of facilities and pressure to force more primary schools, doctors and dentists on the local community. Moreover, I expect there to be thousands of extra cars going through the villages with no possibility of significant improvements to local roads. How can this be considered acceptable??

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14484  **Respondent:** 15603361 / Ann Watkins  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT): • No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it. • No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14540  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14665  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14689  Respondent: 15604833 / Susan Vaughan Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Village expansion is unsustainable. With only one small shop, no post office, a very limited weekdays only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development

1. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the
2. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station and public transport
3. The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

The West Horsley Parish Council and Surrey Community Action Housing Survey conducted in May 2015 identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID: PSLPP16/14700  Respondent: 15606657 / Kim Hopwood  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID: PSLPP16/14791  Respondent: 15607425 / Louise Quy  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Over-development of our area will heavily impact Ripley, Send and Clandon, due to the sheer number of houses proposed - (13,860). Both Garlick's Arch (A43) and the old Wisley Airfield (A35) have no accessible train stations as well as inadequate local bus services. It is therefore inevitable that there will be many more cars used in the area. Additionally, the Plan contains nothing that will improve infrastructure to improve Garlick's Arch. It therefore makes more sense for this development to be sited in urban areas where sustainable transport links are already in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID: PSLPP16/14803  Respondent: 15607553 / Penelope Gillmore  Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The
policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning
decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify
inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as
"sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land
bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF
paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental
impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to register my opposition to Guildford Borough Council's draft local plan on the ground that I think it is unsustainable for the areas marked out. This would be Guildford spreading to create a conurbation which would destroy the life quality that we enjoy at the moment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14987</th>
<th>Respondent: 15609505 / Frank Ray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. <strong>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development should be in urban areas where there is sustainable transport. Traffic congestion, air quality is already a problem, and a loss of habit is seriously worrying.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15064</th>
<th>Respondent: 15610081 / Sarah Kelly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will require a car.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attached documents:

Comment ID: PSLPP16/15106  
**Respondent:** 15610433 / Clare Porter  
**Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*

Attached documents:

Comment ID: PSLPP16/15105  
**Respondent:** 15610465 / Tess Corlett  
**Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*

Attached documents:

Comment ID: PSLPP16/15125  
**Respondent:** 15610529 / Mark Ransome  
**Agent:**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Building 13,860 new houses in such a small area is clearly not sustainable. The over development of Ripley, Send and Clandon will effectively turn them into one conurbation. The local communities don’t need these houses. Where is the transport infrastructure for the Wisley Airfield (A35) and Garlick’s Arch (A43) developments? They have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development needs to be relocated to urban areas where there is sustainable transport.
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

E. Policy S1 Presumption in favour of Sustainable Development – My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15220  Respondent: 15611105 / Ramsey Shubbar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15221  Respondent: 15611137 / Scott Hutchinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15222  Respondent: 15611201 / Jed Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15272  Respondent: 15612481 / Gillian Culmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15389</th>
<th>Respondent: 15614241 / Jane Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the “money runs out” even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15401</th>
<th>Respondent: 15614497 / Hannah Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No statement of how economic, social and environmental impacts should be balanced.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No reference to most of the NPPF Core Planning Principles.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15479</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. It seems to be that virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the area around my village of East Clandon.

I specifically do not accept that the strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in any way sustainable. Wisley will just lead to a large increase in traffic on the A3, and the first two sites do not have railway stations. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15613</th>
<th>Respondent:</th>
<th>15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td></td>
<td></td>
<td>I OBJECT</td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td></td>
<td></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td></td>
<td></td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15658  Respondent: 15618689 / Julia Ray  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The number of houses being proposed is absolutely disgusting. You are creating urban sprawl with no thought to the congestion that will be causes to the surrounding areas. The nearby M25 (have you seen the gridlock in the Heathrow direction daily?) and A3 are already badly congested as is the main road through Ripley. Increasing the number of cars so dramatically is actually downright dangerous and irresponsible. Having driven on the A3 in rush hour often, your plans are complete madness. Since nearly every household will be a 2 car household, this will add thousands of cars to our roads. The future generations deserve better - open spaces and less pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18584  Respondent: 15618881 / Jayne Barmby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S1 gives no definition of “sustainable development”.
The promise “to secure development that secures the economic, social and environmental conditions in the area ”omits to
recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

There is a gap in Policy S1 with regard to Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15691  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but the Greenbelt sites to create new towns of 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15727  Respondent: 15623425 / Jean Davy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The SHMA has not been thought through properly and the plan as it stands is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15732  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15786</th>
<th>Respondent: 15624577 / Alec Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16073  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan: the proposed development is not sustainable (policy S1). The local communities, especially Ripley, Send and Clandon, will be damaged irreparably by the plan for 13,860 new houses which are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16090  Respondent: 15631553 / Anthony Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16248  Respondent: 15636481 / Peta Lawrence  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is little genuine regard for climate change, nor assessment of its impact on the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16328  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):  • No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it. • No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16352  Respondent: 15641281 / Paula Redmond  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided and additional railway stations are planned.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16379  Respondent: 15641505 / Annabella Goldsmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

That the proposed development is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16413  Respondent: 15644577 / John Cotton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the local plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16630  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the local plan making East and West Horsley less sustainable. This is breach of para 7 and 9 NPPF and policy S1 of the proposed local plan. Failing to provide essential health, education and community facilities forces residents to use private vehicles to reach these when at present the majority can walk. The Infrastructure survey suggests that primary and junior school aged children will have to travel to Ripley and Clandon to attend school. No provision is made for any other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16761  Respondent: 15650369 / Stephanie Dean  Agent:
I object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.

Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16824  Respondent: 15653505  Dave Robins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the Local Plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16877  Respondent: 15657057  Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S1 SUSTAINABLE DEVELOPMENT

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16882  Respondent: 15657121  Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Quite simply put I object to the local plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16992  Respondent: 15661761 / Rob Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strategy for location of development.

The destruction of the villages into which the existing inhabitants moved is wrong as it involves a complete change of the environment within which they live.

An increase in the size of Guildford makes a larger town, but does not alter the basic style of living of the people involved. This is a far more appropriate strategy for any development that the Borough needs to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17107  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
This representation and comments focus primarily on housing policies, including specialist housing. The plan contains strategic level policies and Policy S1 relates to the presumption in favour of sustainable development and is an overarching strategic policy compliant with the NPPF. It is welcomed that the Council will take a positive approach that reflects the presumption in favour of sustainable development. It is also supported that the Council will work proactively with applicants, jointly to find solutions that mean proposals can be approved wherever possible. This is a positive strategic policy within the local plan, reflecting national guidance, and it is noted in Paragraph 4.1.1 (of the Guildford Submission Local Plan) that “Local plans must plan positively to seek opportunities that meet the areas’ objectively assessed development needs and be flexible enough to adapt to rapid change”. Given the plan period of 20 years, the requirement for flexibility within planning policy to respond to changes is important and should be engrained throughout the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17206  Respondent: 15672737 / Andrew Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I fear if these proposals are passed as is there will have a significant and negative impact which would lead to irrevocable damage. This is not about need but much more about greed and the council being blinded by the opportunity to increase income at the cost of all existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17651  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S1: Presumption in Favour of Sustainable Development
The NRA support the presumption in favour of sustainable development and the commitment to work proactively with applicants to jointly find solutions that mean that proposals can be approved wherever possible; and to secure development that improves the economic, social and environmental conditions in the area. This approach being compliant with the National Planning Policy Framework (NPPF).
I was object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17385   Respondent: 15682465 / Nick Beesly   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. Therefore support both Policy S1 "Sustainability" and Policy S2 "Housing number".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17469   Respondent: 15687201 / Mandy Cox   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
</tr>
</tbody>
</table>

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17589</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to policy S1 as stated and the presumption in favour of sustainable development.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17609  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst Gladman are in full agreement with the statement for the presumption in favour of sustainable development, we are concerned that the way the statement is expressed in policy S1 is simply a watering down of the policy as contained within paragraph 14 of the NPPF. We are unconvinced that a separate statement, beyond the NPPF is required, however if the Council wish to include the policy it should be as per the wording of the NPPF. At present therefore we do not consider the policy sound by virtue of it not being justified or consistent with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17671  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

At Section 4 of the Proposed Submission GBLP, GBC outline the strategic policies that will underpin all decision making. Policy S1 confirms GBC’s adherence to the presumption in favour of sustainable development. Zurich supports Policy S1 given it reflects the presumption in favour of sustainable development set out within the NPPF at paragraph 14.

Zurich particularly supports GBC’s commitment within Policy S1 to “…work proactively with applicants jointly to find solutions that mean proposals can be approved where possible, and to secure development that improves the economic, social and environmental conditions in the area”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17733  Respondent: 15698753 / Anna Calvert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan because the development proposed is not sustainable (policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17800  Respondent: 15702497 / Isabella Mitchell  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17850</th>
<th>Respondent: 15704865 / Lauren Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Response to Guildford Borough Proposed Submission Local Plan (June 2016)</td>
<td>I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17878</th>
<th>Respondent: 15705729 / Martyn Heard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” I Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17879</th>
<th>Respondent: 15705761 / David Jenner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td>I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The proposed mass housing developments will damage local communities, especially Ripley, Send and Clandon. The development is better suited to urban areas that can provided transport links, these plans are not for local communities, we do not have good rail links, and quite poor bus services, so that means more cars on the local roads.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local plan (Policy S1) on the grounds that the development proposed is not sustainable. How on earth can the total development of new houses some 13,860 be accommodated in the borough with no improvements to the infrastructure. We are already at bursting point with access to schools and doctors, inadequate bus services, sewage removal etc. and the road network is fast becoming gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17932  Respondent: 15710433 / Simon Hester  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the local plan as it is a thoroughly unsustainable according to Policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3020  Respondent: 15711265 / Jonathan Dowling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2949  Respondent: 15714817 / Vicky Dowling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/18411  **Respondent:** 15724353 / Arvnid Parmar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?**  
( ), is Sound?  
( ), is Legally Compliant?  
( )

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25,
including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of
development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable
locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are
also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the
infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more
practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**DEFINITIONS AND SOURCES**

NMSS is a consultancy company specialising in housing demographics
whose principal is Neil McDonald a Management Consultant
specialising in property strategy and research in the public and
private sectors.

References to “local plan” are intended not to be the previous 2003 Local Plan but to be
references to the current Regulation 19 draft local plan 2017 prepared by Guildford
Borough Council.

GBC refers to Guildford Borough Council

SHMA refers to the Strategic Housing Market Assessment 2017 prepared by GL Hearn

OAN refers to the Objectively Assessed Need in relation to housing

NPPF refers to the National Planning Policy Framework

CPRE refers to the Campaign for the Protection of Rural England

GGG refers to Guildford Greenbelt Group

GRA refers to the Guildford Residents Association which comprises over 25 Residents
Associations and five Parish Councils
ELNA refers to the Employment Land Needs Assessment 2017  
NPPF refers to the National Planning Policy Framework  
NPPG refers to the National Planning Policy Guidance

**POLICY S1 SUSTAINABLE DEVELOPMENT**

GGG supports the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

We are of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. GGG is however disappointed that they have failed to put this policy into practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

---

**Comment ID:** PSLPP16/9872  **Respondent:** 15922337 / Andrew Malcher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

---

**Comment ID:** PSLPP16/17693  **Respondent:** 15922337 / Andrew Malcher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Plan Policy S1: Presumption in favour of sustainable development "Sustainable development"? is an oxymoron. No definition of the term is supplied. There is nothing remotely €œsustainable€? about building hundreds of houses in places where infrastructure is already overloaded, whilst simultaneously destroying irreplaceable Ancient Woodland and/or Green Belt - as for example at Send and Ripley or at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

---

**Comment ID:** PSLPP16/15556  **Respondent:** 15977889 / Charles Kimpton  **Agent:**
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1 - Presumption in favour of sustainable development

OBJECT. This policy fails to recognise the inadequacy of infrastructure. It is unsustainable and needs to state a restraint on development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2052  Respondent: 17243169 / RSPB (Chloe Rose)  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

Presumption in favour of sustainable development 4.1.4 – The RSPB agrees with the proposed amendments and consider that these helpful clarifications help make the Plan sound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/441  Respondent: 17283297 / John Ball  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1213  Respondent: 17380865 / Crownhall Estates (Sir or madam)  Agent: Turley (David Murray Cox)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

POLICY S1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
Whilst the inclusion of Policy S1 relating to the presumption in favour of sustainable development within the Proposed
Submission Local Plan is supported, the ability of this Policy to operate as intended is questionable. As these representations highlight, the Proposed Submission Local Plan seeks to designate land currently designated as Countryside Beyond the Green Belt as being within the Green Belt. Consistent with the text of paragraph 14 of the NPPF, criterion 3(b) of Policy S1 states that permission will be granted unless (inter alia) specific policies in the Framework indicate that development should be restricted. Footnote 9 of the NPPF provides sets out policies, including Green Belt, which restrict development.

If the whole of the Borough (other than settlements and allocations and a small area to the west of Ash and Tongham) is to be within the Green Belt then this severely restricts the opportunities to apply the presumption in favour of sustainable development. This is reinforced by paragraph 4.1.4 of the Proposed Submission Local Plan which states: “In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” (Our emphasis)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1584  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

1. Introduction and Background Information

1.1 PRP was formally appointed by Guildford Vision Group (GVG) in May 2017 to represent it in the submission of a detailed response to the regulation 19 consultation on the proposed submission Local Plan for Guildford Borough Council (GBC).

1.2 Guildford is a gap town and the focus of a number of particular problems. The town has confined road, rail and river corridors, topographical issues and a historic core, all of which add to the complexity of Guildford along with a major investment deficit in infrastructure.

1.3 GVG, which is comprised of people who have long resided in the borough, and who often have relevant professional expertise on planning matters, was established on 21st March 2012 at a public meeting with the aim of working towards a deliverable masterplan for Guildford. Initial activity analysed the state of the town centre and identified 17 issues. Several background documents are appended to this consultation response, including The History of GVG (appendix 1), and 'Who is GVG' (appendix 2).

1.4 GVG produced a document in 2013 entitled 'Guildford on the Way' (appendix 3) which serves as a helpful summary of the aims of the group and was supported by members of the public and included their contributions. This document was submitted as part of the response to the Guildford Local Plan Regulation 18 consultation in 2014 by both GVG and The Guildford Society.

1.5 GVG has identified 17 key issues related to the town centre which require addressing:

1. Road safety
2. Pollution
3. Traffic blight
4. Traffic management
5. Lack of pedestrianisation
6. Proper use of riverside
7. Flood prevention
8. Railway station
9. Bus station
10. Cycleways
11. Access and parking
12. Housing
13. Student accommodation
14. Business space
15. Social buildings
16. Arts & education provision
17. Leisure facilities From these 17 issues GVG has set itself six keys goals to transform

1.6 the town centre:
1. Wider pedestrianisation of the town centre
2. Exciting new public space and a reinvigorated riverside
3. Redirection of traffic away from the town centre
4. An integrated road and rail hub
5. More town centre housing
6. A new bridge for a better East-West link

1.7 Sustainable, environmental and infrastructure solutions can be forthcoming but only realistically with comprehensive, integrated and master planned solutions. The draft local plan fails to recognise or make a case for this, or any approach to capture and address any of the ‘17 issues’ GVG has identified.

1.8 GVG notes that, although Guildford has been one of the most economically successful towns over the past 30 years, this position is under threat from infrastructure deficit and a lack of commercial space and housing. GVG also notes the emerging desire, via LEPs and County Councils, to collaborate in an arc of towns around London, stretching from Cambridge via Oxford to Reading, Guildford and Ashford. This is a major opportunity for high tech businesses in particular to collaborate. Guildford, with the right vision and leadership, can build on its strengths, based on the University and the associated Research Park, to take advantage of this opportunity.

1.9 Town centres are subject to major challenges due to changing patterns of retailing, new transport possibilities e.g. autonomous cars, and the need to become far more environmentally benign. GVG believes the Plan is a missed opportunity to position Guildford town centre for the future.
1.10 In particular, land use for the whole of the town centre has not been considered effectively e.g. GVG is aware of several sites that may be subject to redevelopment in the planning horizon that are not in the Plan. Environmental factors are also inadequately covered e.g. District heating, power generation and flooding. Finally, traffic issues are not addressed nor the interchange between modes of transport.

1.11 The draft plan proposes a Guildford with a quantum leap in shopping space that will be inaccessible due to inadequate transport provision. New housing is scattered around the edges of the town centre with inadequate provision made for transport and other facilities. Proposed employment centres may exacerbate transport difficulties e.g. more cross-town commuting.

1.12 The GVG proposals provide an opportunity to build an environmentally friendly town centre, with the flexibility to optimise housing and commercial space.

1.13 A key ambition of GVG is to enable growth whilst delivering environmental quality for the community through a comprehensive, masterplan-led solution. The current draft Local Plan fundamentally fails to consider how this can be achieved in the town centre, and indeed the wider borough. These fundamental goals are central to this consultation response and are relevant to many of the specific policies being consulted on.

1.14 In 2016, GVG persuaded the council to commission a town centre masterplan, the first of its kind since 1943, through Allies and Morrison Urban Designers. However, GVG was concerned that the undisclosed brief did not require the masterplan to adequately address road and other infrastructure issues. Accordingly, GVG feels it has had limited value. In response to the perceived limitations of the masterplan and using professional town planners, GVG has commissioned and published its own masterplan for the entire town centre (appendix 4) in January 2017. This has received support through press, newsletters and social media and at a number of public events.

1.15 The National Planning Policy Framework (NPPF) is very clear on the role which town centres have to play in the growth of boroughs:

*Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.*

*Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a town centre first’ approach and taking account of specific town centre policy.*

1.16 It is considered that the draft plan presented by GBC has fundamentally failed to consider this most basic of planning principles and on this issue alone the Plan is unsound. There are a number of more specific planning policies on which GVG has comments. They are addressed in turn throughout this document.

1.17 This submission builds upon much of the previous work undertaken by GVG which has submitted representations on the previous consultations of the Local Plan in 2014 and 2016 (appendix 5).

1.18 The Regulation 19 consultation includes a significant amount of red-lined (amended) text and policies, each and many of which will, separately and in the context of the entire Local Plan, have some impact on other elements - particularly on the town centre and its crucial infrastructure. It also substantially alters the evidence base without any impact assessment on the Local Plan itself and on any unaltered policy and associated commentary. In its response GVG has attempted (to the best of its ability) to assist the Council to understand how the proposed submission draft Local Plan falls short of the requirement to be a forward-looking Plan that is balanced and sound.

1.19 The GVG Masterplan has been prepared to meet all stated criteria of the policies in the draft Local Plan, as well as meeting criteria to mitigate the 17 issues identified by the group. In addition, it has tested its masterplan to ensure that it is practical and deliverable. GVG has concerns, as detailed below, that the draft plan is not sound and will fail to be pass examination stage, with consequential impact on Guildford and its environs.
[Extract from GVG Masterplan - appendix 4]

1.21 Overall the draft Local Plan demonstrates reluctance by GBC to build new housing before infrastructure is provided. Whilst GVG understands this reluctance it does not demonstrate the forward thinking that is required for Guildford over the next 20 years. It does not provide solutions which GBC can begin to implement without fundamental reliance on external agencies (as is the case with much of the enabling infrastructure in the draft submission Local Plan). If the Plan is carried out as presented by GBC, there will be an increase in population in the wider borough with none of the associated increase in social or physical infrastructure that is required. The pressure that will be put on Guildford town centre from the growth of the borough, and indeed that of surrounding boroughs, will lead to excessive stress on the already failing infrastructure in the town.

1.22 Through properly masterplanning the town centre, alongside a fundamental redesign of the physical infrastructure, the GVG Plan is able to deliver substantial additional benefits over and above just housing growth including business space, environmental benefits, tourism, leisure power solutions, and flood defence.

1.23 GVG is therefore extremely concerned that the proper masterplanning of the town centre and the Area Action Plan for the town centre are not being prioritised alongside the Local Plan and instead being delayed until after potential adoption of what GVG would consider to be inconsistent policies.

1.24 The opportunity to deliver a world class town centre can be achieved but requires a coordinated approach with all interested parties, and in which the GVG Plan can play a part.

Local Plan Consultation 2. Requirements

2.1 Of the 12 Core Planning Principles set out in paragraph 17 of the National Planning Policy Framework (NPPF) the first clearly states that planning should:

Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to date, and be based on joint working and cooperation to address larger than local issues.

2.2 As a town, Guildford plays a much wider role than just providing for the immediate needs of those in the borough. Its sub-regional role means that the future of Guildford town centre will have significant bearing on those living within the much wider sub-regional area. The recent South East Missing Links Study 2016 identified the importance of South East Region towns collaborating over commercial activities to ensure the region continued to prosper as a vital economic engine for the country. Guildford is a key centre in the South East Region.

2.3 GVG has consistently attempted to engage with GBC to bring forward a comprehensive Plan for Guildford town centre which addresses the significant opportunities and constraints currently experienced in the town centre. The previous Allies and Morrison masterplan and updated Town Centre Regeneration Strategy fall significantly short of resolving these issues, even if there was an intention shown to adopt them in policy.

2.4 Paragraph 155 of the NPPF goes on to state that:

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

2.5 The 17 issues as outlined previously represent the collective vision as set out in para 155 of the NPPF and that GVG consider itself to represent a wide section of the community. GVG has engaged with officers and senior staff within GBC via a series of meetings since its formation. For reasons that are unclear, the council has expressed only cursory interest with the details of the GVG Plan, and has studiously ignored reference to it in any communications and consultations. From 2012 to 2017 the message from the council has consistently been that they have been too busy with Local Plan issues to address the issues around the town centre (which is central to the GBC area!) or make officer time available.
Requests for collaboration and further information have been met with indifference over a dozen or so meetings with GBC and no information has been voluntarily supplied. Much of the information which GVG has reviewed has been obtained through Freedom of Information requests. GVG has been frustrated by the non-engagement of GBC. This is in direct contradiction to para 155 of the NPPF which forms a fundamental consideration in the development of the GBC Local Plan.

2.6 In examining the Local Plan the appointed inspector will need to consider the conformity with paragraph 182 of the NPPF which states:

The Local Plan will be examined by an independent inspector whose role is to assess whether the Plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a Plan for examination which it considers is “sound” – namely that it is:

• **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

• **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

• **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

• **Consistent with national policy** – the Plan should enable the delivery of sustainable development in accordance with the policies in the Framework. GVG is pro-growth and recognises and embraces the need for housing

2.7 but also considers that Guildford town centre should be regarded as key infrastructure for both the Borough and the wider region. It should be afforded a properly considered place and detailed plan in the Local Plan rather than matters being left to chance and piecemeal development. Delivery of housing in a quality environment should be equally as relevant to plan making.

2.8 It is the opinion of GVG that the proposed Local Plan in its current form cannot be considered as sound and it is with these criteria in mind that this response has been prepared against individual policies contained within the draft Local Plan. Similarly, it is against these same criteria against which the GVG Masterplan has been prepared.

2.9 The council previously undertook a regulation 18 consultation on the Plan in June 2014 to which the GVG provided a detailed response (appendix 5)

2.10 As per the Planning Practice Guidance (PPG) [Paragraph: 017 Reference ID: 12-017-20140306]

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account. It must also consult the Strategic Environmental Assessment consultation bodies on the information and level of detail to include in the sustainability appraisal report.

2.11 Overall, it is considered by GVG that previous consultation responses by it and other interested groups such as the Guildford Society have not been taken into account in the preparation of this regulation 19 draft plan. Accordingly it is considered that the basic conditions of plan making, as set out within regulation and government guidance, have not been complied with and the plan is unsound.

**Statutory Duty to Co-operate**

2.12 The Duty to Cooperate (DTC) Topic Paper which forms part of the evidence base is acknowledged. However there are some shortcomings as to how the council has sought to comply with the DTC as set out in the Localism Act 2011, and amended by the Planning and Compulsory Purchase Act 2004. The DTC is not a duty to agree but the NPPG is clear that...
local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2.13 In addition to cooperation with surrounding local planning authorities, other bodies are subject to the DTC as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013.

2.14 These bodies are:

• the Environment Agency
• the Historic Buildings and Monuments Commission for England (known as Historic England)
• Natural England
• the Mayor of London
• the Civil Aviation Authority
• the Homes and Communities Agency
• each clinical commissioning group established under section 14D of the National Health Service Act 2006
• the National Health Service Commissioning Board
• the Office of Rail Regulation
• Transport for London
• each Integrated Transport Authority
• each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
• the Marine Management Organisation.

2.15 Having reviewed the DTC Topic Paper and the policies contained within the draft Local plan, GVG believes there is a high level of ambiguity and uncertainty around the delivery of infrastructure to support the level of housing allocation and the impact this will have on the traffic in the town centre.

2.16 The Topic Paper references the Local Strategic Statement (LSS) produced by the Surrey Strategic Planning and Infrastructure Partnership. The memorandum of understanding appended to the Topic Paper demonstrates that it has been agreed by all local authorities in Surrey, but there is no reference to Highways England which controls the A3, the principal route through the borough. We presume that it has been removed because GBC has as yet failed to reach agreement with Highways England.

2.17 The PPG also sets out that:

Close cooperation between district local planning authorities and county councils in 2-tier local planning authority areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.

Paragraph: 014 Reference ID: 9-014-20140306 11
2.18 Communication between GVG and Surrey County Council suggests that this element of the DTC has not been satisfied either, particularly regarding transport infrastructure.

2.19 It is the opinion of GVG that the Statutory Duty to Cooperate has not been complied with and accordingly the draft Local Plan is unsound on this basis alone.

2.20 Irrespective of the DTC having failed, the draft Local Plan has no vision for the town, no plan for delivery, and sets a course for ad hoc development which will frustrate most of the Local Plan objectives as listed.

POLICY S1: Presumption in favour of sustainable development

3.1 As set out in the previous representations, GVG is actively pro-growth and supports well designed development as part of strategic solutions recognising the sub-regional role of Guildford.

3.2 At paragraph 4.1.4 additional text has been added to reasoned justification of policy S1 which suggests that the presumption in favour of sustainable development will not apply to sites listed under footnote 9 of paragraph 14 of the NPPF. This is clearly correct in policy terms but specifically for Guildford this would assume that the council employs a 'brownfield first' approach to achieving housing supply. GVG would agree with this as an approach, but this message is inconsistent in the Local Plan and not reflected in appropriate infrastructure or support.

GBC should be promoting the delivery of suitable brownfield sites early in the Plan process. More recognition is required to the alternative delivery strategies required should the main allocated sites not come forward or delivery rates be slower than anticipated.

3.3 GVG also recognises the historic failures of successive Councils in Guildford to plan proactively and comprehensively over decades. This has led to there being relatively little brownfield land that can be brought forward by the market in such a way as to: A) deliver as much development as it could were it masterplanned; and B) not place such a burden on historically poor and unresolved infrastructure as to constitute sustainable development. For this reason, as much as any other, GVG has been campaigning for proper joined up urban planning to bring about transformation, development and growth in a sustainable way in our core town centre. This approach could equally apply to the outlying residential estates in north-west and north Guildford, where GBC freeholds also predominate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7487  Respondent: 17424705 / Keith Brothwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Loss of agricultural land

The plan will result in significant loss of agricultural land, including significant loss of land that is grade 3a quality and therefore classified as ‘best and most versatile’ in the national context. On this basis, the SA says that it is appropriate to predict significant negative effects. Agricultural growth may well be a priority for the UK following Brexit and it would seem sensible to avoid destroying valuable land providing employment and economic growth until the future is better understood. Investment in such areas would seem more appropriate at this time. A UK prime agricultural college sits very close to the proposed developments in the local plan (Merrist Wood) and some mention of it would seem logical and desirable with regard to these proposed developments.
I look forward to it, but object most strongly to the plans in their current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2829  Respondent: 17452673 / Philip and Maureen Blunden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2791  Respondent: 17490177 / Fabia Dyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2801  Respondent: 17490209 / Elizabeth Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2821</th>
<th>Respondent: 17490561 / Derek Gillmore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>Sound?</strong> ( ), <strong>Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2826</th>
<th>Respondent: 17490593 / Emily Edwards</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>Sound?</strong> ( ), <strong>Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2845</th>
<th>Respondent: 17490753 / David Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>Sound?</strong> ( ), <strong>Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2848</th>
<th>Respondent: 17490785 / Mary Ball</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2863</th>
<th>Respondent: 17490881 / David Smylie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2911</th>
<th>Respondent: 17491297 / Sonja Freebody</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest...
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2915  **Respondent:** 17491329 / Maura Dearden  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2936  **Respondent:** 17491425 / Moira Maidment  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

E. **Policy S1 Presumption in favour of Sustainable Development– My Objections**

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2973</th>
<th>Respondent: 17492833 / Helen Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2982</th>
<th>Respondent: 17492897 / James Robinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2989</th>
<th>Respondent: 17492993 / Jenny Rampe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest.
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

Comment ID: pslp171/3001  Respondent: 17493505 / Nigel Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

Comment ID: pslp171/3004  Respondent: 17493505 / Nigel Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

Comment ID: pslp171/3013  Respondent: 17493569 / Kim Poysner-Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3084  Respondent: 17494945 / Diana Mulholland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3090  Respondent: 17495041 / Paul Mulholland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3094  Respondent: 17495105 / Simon Chambers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3111  Respondent: 17495393 / Samantha Gilchrist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3126  Respondent: 17495521 / Elizabeth Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/3198</th>
<th>Respondent: 17496161 / Ray Mackay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E. Policy S1 Presumption in favour of Sustainable Development– My Objections</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3207</th>
<th>Respondent: 17497345 / J.E. Pullen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3228</th>
<th>Respondent: 17507713 / T. A Trusler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Total records: 1143.
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Document part: Policy S2 - Planning for the borough - our spatial development strategy
## Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1185</th>
<th>Respondent:</th>
<th>8554113 / Anthony Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. **Housing Number**

The proposed housing target of 12,426 is based on assumptions which have not been made public and doubtless would not withstand public scrutiny. A much lower figure of 400 per annum has been proposed as adequate to meet Guildford's overall needs by an acknowledged professional analyst, Neil McDonald of NMSS.

The proposed policy is flawed and should be amended. In the last consultation 97% of responses were against the proposed policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2802</th>
<th>Respondent:</th>
<th>8555041 / Adrian Platt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

My first comment is that I am deeply shocked to see that little or no attention has been paid to the comments made by a significant number of residents in the last consultation. The overwhelming local view that the Green Belt must be maintained at all costs, and that brown field sites should be used for a large part of the housing needs, has been completely ignored.

Once again the method of communicating to Home Owners and Occupiers is totally unacceptable. In January 2014, I had sent a suggestion of how the Borough might **directly** write to **every** Home Owner or Occupier so that they are fully aware of the proposals. This is because so many key people were not aware of the plan or the needed action. I had an email from the then Councillor in charge of the Local Plan agreeing that their consultation must be improved. This has not been done and so many people may be disenfranchised.

These points above show that the much needed democracy to progress such an important plan is destroying the credibility of the process.

Whilst I will leave official bodies, such as Parish Councils, to comment in more detail on the specific Policy Issues, I now set down my principal concerns.

First and foremost I **object** to the number of new homes proposed for the Borough. By every calculation this target would increase the population of the Borough at a rate higher than at the latest 10 year period as measured by the censuses. Furthermore this figure is totally unsustainable by any measure.
I strongly **object** to the use of the brown field sites for industrial or office development. There is no justification whatsoever to show that there will be an adequate demand for such space. Indeed it seems highly unlikely that such space would be able to be let or sold in our high cost area. Therefore the reassurances made by GBC officers, after the last consultation, to use brown field sites for housing have been ignored. This is of such importance that I find that this complete lack of attention to this point is insulting.

I **object** to the whole 2016 Local Plan since firstly the consultation process is undemocratic, secondly because much of the information is inaccurate or misleading, thirdly most of the plan has been shown to be unsustainable with inadequate addressing of the infrastructure needs, fourthly no convincing argument for "exceptional circumstances" has been made to wreck the Green Belt which is a vital feature of our Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:**  PSLPP16/18685  **Respondent:**  8555233 / Safeguard Coaches Ltd (Mr A J Halliday)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---

**Safeguard Coaches' Response to Guildford's Revised Draft Local Plan**

**Introduction**

Safeguard Coaches is an award-winning family-owned bus and coach business which has been based in Guildford for over 90 years. It operates 10 local buses (on Routes 4 and 5 to/from Park Barn and the Hospital) and 30 coaches and employs over 60 staff, approximately half of which work in Guildford.

**Our Concerns**

Safeguard Coaches accepts that some development will be required in Guildford and its environs. **However, we are both surprised and concerned at the scale of development proposed in the draft Local Plan, given its present deficit of transport infrastructure and the barriers to easy movement created by the North Downs (Guildford is a 'gap' town), the River Wey and the main railway.**

Guildford is a wonderful, historic and vibrant town with a potentially great future ahead of it. However, there is a widely-held view that the Town's Achilles heel is its road transport system which lacks adequate capacity and resilience because very little investment has been made despite the Town growing substantially over recent years. Consequently the Town suffers appalling traffic congestion which blights the Town's economy and people's enjoyment of the Town's amenities.

**For Safeguard Coaches traffic congestion and the consequent lengthening, and unpredictability, of bus and coach journey times and the negative impact on customer experience is a major issue.**

There has been a noticeable worsening in the situation since September 2015, particularly at peak hours, perhaps as a result of reduced fuel prices encouraging greater car use and increased numbers and length of car-borne home-to-school journeys.

Over the last 10 or so years the time to undertake a single trip (with appropriate recovery time at Guildford Bus Station) on our Route 4 and 5 local bus route {Town Centre-Hospital-Park Barn Westborough-Town Centre} has increased from 40 minutes to 52/53 minutes in peak hours, a 30% increase (the equivalent increase in off peak periods is 5 minutes or
12%). Average peak hour bus speeds are now as little as 8 mph (10 mph excluding recovery time at Guildford Bus Station).

We are in danger of entering a spiral of decline with yet more resources (hence costs) required but with bus patronage reducing (due to increased journey times, unreliability etc) with all the adverse consequences this will have for sustainable travel in and around Guildford.

Safeguard Coaches believes that the revised draft Local Plan pays insufficient attention to the much needed transport infrastructure upgrades meaning that further proposed development will put more pressure on the existing transport systems, particularly the local and strategic road network, creating major difficulties for public transport, hampering economic growth in the area and damaging small local businesses like ours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12491  Respondent: 8555745 / Mr Alan Short  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the lack of any evidence for the alleged housing need and numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18095  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Planning for the borough - our spatial development strategy

“4.1.6 Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). “

Need to be clear that in Green Belt openness is the determinant. Hence, previously develop open land should not be preferred.

“4.1.8 Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. “
This policy sequence moves too readily to allocating green field sites and omits to encourage efficient use of previously allocated land or initiatives to assemble brownfield sites. This reflects weaknesses, until recently, in the Council’s own approach. There is a risk the policy as drafted will also encourage developers to turn too readily to greenfield sites rather than to engage in redevelopment initiatives.

There are errors in the development need identified and the harmful consequences of meeting need have not been weighed in an appropriate assessment.

“13,860 new homes,” The OAN on which this is based is exaggerated.

“4.1.10 This is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033.”

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

“4.1.12 Table 1 shows a number of new homes that is greater than the figure in the policy. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. Further details of these and other sites are provided in the site allocations policy of the Local Plan.”

It is inappropriate to designate more land than required given the constraints.

Monitoring Indicators

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

Object: departures from Green Belt policy including purpose 5, housing figure based on inaccurate and flawed assessment of need

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2586  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In line with our evidence and soundness comments, we do not support the revised figures for housing.

In line with our evidence and soundness comments and our previous response, we do not support the revised retail figures.

We welcome the realism that some sites will not be able to deliver until later in the plan period and the link to infrastructure. However, we do not accept that many of the sites in the SHLAA are appropriate for development.

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.
It is inappropriate to propose a large development buffer given the constraints.

**Monitoring Indicators**

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8519</th>
<th>Respondent: 8556673 / Andrew French</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

More generally, it appears that the objectively assessed housing need appears to have outweighed any consideration of the damage that the plan does to Guildford’s existing Green Belt protection, particularly in the East of the Borough. Appropriate constraints to development, such as the need to retain Green Belt except in exceptional circumstances and the demands on existing infrastructure appear to have been completely overridden by housing need. There do not appear to be any circumstances under which the overall housing numbers would have been constrained, regardless of how high they were. I do not believe that is a correct interpretation of Government planning guidance.

I do not wish to argue that there should be no development on any part of the Borough’s (or indeed, West Horsley’s) Green Belt. I recognise that there is real pressure on the Borough to increase its housing provision in the face of a rising population, increasing birth rate and other demographic trends. However, it is the scale of development proposed in the immediate area that is unacceptable. Growth in the village of around 10% over the plan period, resulting in a release of one or two of the proposed Green Belt sites for development during the plan period would allow the village to grow organically and accommodate some much needed affordable housing. That would also balance the demands on the infrastructure, while going some way to accommodating housing need. However, proposals on this scale, all of which are scheduled in the plan’s first five years, will transform the face of the village forever and not for the better, which is why I wish to make a strong objection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11405</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
P26-27. The housing and retail targets are too high, see 3 above.

P29, Table 2. The town centre function must include provision for the everyday convenience-retail and service needs of local residents; our area to the SE of the centre has no “Local Centre” and so nowhere else where this function is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1447  Respondent: 8560833 / Mrs Carolyn Mayne  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: The Plan as a whole is undermined by massive errors in the housing need figures. The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5085  Respondent: 8561057 / Chris Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5530  Respondent: 8561057 / Chris Brown  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2). The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17680  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Society recognises that we need to develop more homes than we have in recent years. We recognise that there is likely to be an impact on the Borough’s Green Belt.</td>
</tr>
<tr>
<td>The Society recognises that some substantial strategic developments will be necessary in order for the infrastructure to come forward (through development) to ensure the development can be implemented sustainably.</td>
</tr>
<tr>
<td>In Annex 6 of the Society’s original response, we highlighted the land uses and densities of all of the Lower Super Output Areas (‘LSOAs’) across the Borough.</td>
</tr>
<tr>
<td>Figure 8, below, shows the allocations nearest to Guildford Urban Area with the LSOA boundaries and with the Bushy Hill area highlighted in yellow.</td>
</tr>
<tr>
<td>The details of LSOA Guildford 008E are set out in full in Annex 6 of the original response but some are set out below in Figure 9</td>
</tr>
<tr>
<td>The Bushy Hill LSOA is 25.5Ha and comprises 649 households at 25.4 dwellings per hectare.</td>
</tr>
<tr>
<td>The Blackwell Farm allocation of 78Ha if developed at the same density would yield 1,985 homes, whereas the allocation is for 1,800 homes.</td>
</tr>
<tr>
<td>The development of Blackwell Farm, however (if it is even considered suitable for final allocation), would need to be concentrated nearer to the railway at the lower end of the site so as to protect the openness of the remaining Green Belt, and the views into and out of the AONB.</td>
</tr>
<tr>
<td>This example serves to demonstrate that our planning of residential settlements needs to be different from our previous urban extensions.</td>
</tr>
<tr>
<td>There are many academic papers referring to the application and implications of higher density development, and it is important for us and our communities to understand this.</td>
</tr>
<tr>
<td>An example of typical built densities is at Figure 10 (below), taken from CABE’s report on Better Neighbourhoods – used here because of its simplicity. <a href="http://www.mae.co.uk/assets/pdfs/better-neighbourhoods.pdf">http://www.mae.co.uk/assets/pdfs/better-neighbourhoods.pdf</a></td>
</tr>
</tbody>
</table>

---
The Society’s Annex 6 summary of areas identifies, in the same place for each LSOA, the built densities and the relative deprivation indices.

There are clearly areas of the Guildford Urban Area which would benefit from positive planning policies towards simultaneous densification and the creation of stronger communities and better infrastructure.

To a great extent the Reg19 Consultation Draft is silent on these areas (notably Park Barn, Westborough, Bellfields, Slyfield) where relative social deprivation is particularly poor on a local, regional and even national scale.

Figure 11 (below) shows that the Park Barn area is at approximately 20 dwellings per hectare, but that the relative deprivation (particularly for young people) is in the poorest 3% in the country.

These issues are not without solutions in the long term but the plan must facilitate development in new settlements that does not repeat spatial planning problems of the past and that the emerging Local Plan provides the policy support it can to enable a development-led solution in these areas.

Turning to the Housing target, we fully endorse the study, analysis and findings of Neil McDonald on behalf of GRA, and reject the GL Hearn SHMA in its approach, methodology (especially where this has not been provided for critical analysis), and findings.

The GL Hearn study is merely one professional opinion. It should not be read as a factual or empirically accurate forecast. GL Hearn’s report fails to demonstrate it is more than an educated guess and, in this case, the guess appears to be both poorly founded and wildly inaccurately formed.

GL Hearn has failed to understand the impact of Guildford’s University and wider further education institutions upon the overall demographic make-up of the Borough.

It is unfortunate that the ONS has failed us and the professionals in its own inability to screen for student communities and in the poor structuring of questions in the 2011 Census.

The measurement of inter-census immigration by reference to GP registrations, and the failure to recognise the effect of overseas students leaving their studies without deregistering from GP surgeries, has been completely missed.

The Society’s population analysis (part of the response to the 2014 Draft SHMA, annexed to the Society’s Reg18 Consultation response) highlighted the ineffectiveness of the question to students in Houses of Multiple Occupation (‘HMOs’) relating to non-term-time residence. There was only one area for the nominated head of household to record non-term-time address, where the HMO may have had three to ten students who were resident at the time of the census.

The Society has set out the following POSITION STATEMENT on housing:

Position Statement 1 - Housing

Whilst supportive of the stated intention, The Society is very nervous about the proposed structure of the Local Plan whereby land allocations are made at the outset, where timings are targeted towards infrastructure delivery, and where such control of the pipeline may not be controllable in that way over the course of the Plan.

The Society would like to see:
38.1. a constrained plan with a lower target housing number, an early review and frequent subsequent reviews to establish that there can be no development without the infrastructure;
38.2. allocation of several of the sites for future development beyond the plan period, but with the acceptance that, if the housing need requires AND the infrastructure has been put in place or is already committed, these sites could be brought forward within the plan period – otherwise they would serve (in accordance with NPPF) as identified sites for development beyond the plan period;
38.3. a clear process and commitment by the Council to collect and analyse local household formation rates and population flows to ensure that any distortive effects of the University’s transient population can be taken into account alongside specific structural shortcomings in our local economy’s employment base. This will ensure that the
proposed plan reviews are objective and relevant, taking full account of the Office for National Statistics (‘ONS’) background data and local conditions;

38.4. the progressive improvement of key areas of the Evidence Base many parts of which remain incomplete, underwhelming, or simply ineffective and not fit for purpose (this applies particularly to the Settlement Profiles – in particular as it applies to the Guildford Urban Area – which should form part of a strong basis for land allocation decisions and regeneration plans in settlements across the Borough;

This Position Statement is at odds with the Council’s approach but is a pragmatic interpretation of the anticipated ability of the Council (in the context of planning legislation and regulation, and the unpredictability of interpretation of policies in practice).

Position Statement 2 – Housing Numbers

Whilst recognising the need for Guildford, where possible and subject to very real constraints, to provide sufficient housing to meet our needs, we do not have faith in the West Surrey SHMA (for Guildford, Waverley and Woking) prepared by GL Hearn for the combined commissioning authorities.

The Society has studied the SHMA, has observed the evidence, has read the analysis prepared for the Guildford Residents’ Associations (‘GRA’) by Neil McDonald (June 2016) and has studied the census and ONS data.

We have concluded that there is a very high likelihood that the SHMA substantially overstates the Objective Assessment of Need because:

The West Surrey SHMA shrinks from analysis of the underlying population data which show a statistical error in ONS estimates for Guildford far in excess of that for surrounding authority areas. Two charts below show an illustration of the population age ranges where the errors occur, and the corresponding population profiles. It is absolutely clear that GL Hearn has failed to question its data effectively and the Society believes it has made a serious error of professional judgement in its analysis for this important University Town:

The proposed ‘affordability uplift’ is flawed;

45.1. The (usually transient) student population needs to be separated out from the remainder of the population in order to ensure the Local Plan provides appropriately for both groups;
45.2. Housing estimates for economic growth are essentially double-counting and should be removed (or at least properly validated);
45.3. An adjustment is likely to need to be made in the near term depending upon the outcome of post-Brexit decisions (personal, economic and political);
45.4. Consequently, the Society believes our Objective Assessment of Need (‘OAN’) is in the region of 510 homes per year, and that this should be the basis of the Local Plan (with the proposed reviews and analytical approach proposed in Position Statement 1).

In the event the Local plan overstates the OAN, the existing shortfall of infrastructure will come under additional strain, the pressure to develop housing will probably outweigh any delay in or failure to commit funds to infrastructure, and planning policy does not allow for development to finance pre-existing deficiencies in infrastructure.

Housing Density

Using the CABE figures, and planning an urban extension or settlement to have, say, 50% Urban Village, 33% Garden Suburbs and 17% Suburban Semis would generate an overall density of circa 65dpH in masterplanned sites. A development of 1,800 homes would require a land take of around 28Ha and, with a concentrated village core, services (including buses) would become more viable – all the more so if this were concentrated around a new transportation hub such as a railway station.

With this in mind, an area the size of Bushy Hill could accommodate almost three times the number of homes, and a large portion of, say, Blackwell Farm and Gosden Hill Farm (notwithstanding our separate comments about these proposed allocations) could be retained and made a permanent Green Belt boundary and/or Sustainable Area of Natural Greenspace.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1768</th>
<th>Respondent:</th>
<th>8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

p) Whilst not strictly an amendment, Paragraph 4.1.6 looks out of place in a plan that does not include any substantial town centre allocations.

a. The Local Plan suggests 1,151 homes for an area of the town centre where the Guildford Vision Group has identified scope for 3,787 homes. The Local Plan allocates some sites, but is missing others. The almost complete absence of detail puts at risk the entire Local Plan.

q) The Guildford Society welcomes, on the one hand as it is a Green Belt site, the removal of the site at Flexford and Normandy from the plan; on the other hand, however, we are mystified as to why it is more appropriate to include development in the Green Belt at, say, Send, whilst removing a Green Belt site which includes land (deleted Policy A47) of which a substantial portion is within 500m of Wanborough Station, which would place it second only to Guildford Town Centre in the sequential test in Policy E2(Note that this station is not included in newly provided Appendix A1). This suggests that the Council sees sites accessing the already-congested A3 as superior for development to a site meeting its needs for available land.

r) We note at 4.1.9 that North Street is now included as a Strategic Site.

s) In Policy S2 we note the deletion of the jobs forecast, the reduction in proposed office space from 47,200 to 43,700 sqm (GVG’s town centre plan envisages 51,000 sqm of new offices and civic space, although it does propose to demolish some office areas to achieve this). We note there is a proposed reduction in industrial land allocation by at least a Hectare.

t) In Policy S2 – Annual Housing Target, we note the increased back-loading of housing provision and the explanation for this. We do not see a connection between the Infrastructure Delivery Plan and the propensity to deliver housing in this ‘contingent’ plan (see (a) above). This is surely an omission in such a contingent plan, where there should be a detailed timescale for the provision of infrastructure, against which a timeline for housing delivery should be mapped out.

u) From the housing numbers, we can see these rising from 450pa to 850pa over the fifteen-year period 2019 to 2034, totalling 9,810 homes. The total stated target for the plan period is 12,426 homes. Mathematically, this leaves 2,616 homes to be delivered in the four years from 2015 to 2018 inclusive – an average of 653 homes per year. From the 2015-2016 Monitoring Report, completions in recent years (including 2015, where there was a shortfall of 265 homes) were:

<table>
<thead>
<tr>
<th>Year</th>
<th>Completions (net)</th>
</tr>
</thead>
<tbody>
<tr>
<td>07/08</td>
<td>478</td>
</tr>
<tr>
<td>08/09</td>
<td>130</td>
</tr>
</tbody>
</table>
Paragraph 4.1.9a notes that ‘strategic greenfield sites...[are] dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period’ (the emphasis is ours).

w) There is no such requirement cited in the plan for town centre infrastructure, and Table 1 (Paragraph 4.1.12 has been deleted so we cannot see where the Council anticipate its development will actually occur). Please see our comments with regard to the serious shortcomings of the SHMA and the Objective Assessment of Need.

y) Paragraph 4.1.9b says that the Council is demonstrating a rolling five-year supply but the deletion of Table 1 does nothing much to demonstrate explicit supply throughout the plan. It is, therefore, far from clear where the crucial evidence is for the rolling five year supply in the short term. If not a clearly-produced table such as has been deleted, there should be at least a clear diagram showing a broad-brush picture of how the housing target will be delivered over time.

z) At 4.1.11 the plan points to further details of sites key to delivering the strategy, and yet these policies do not include timetables that would then give confidence of the delivery of both homes and infrastructure (together with economic, environmental and social gains – Paragraph 4.1.2a) in accordance with the Annual Housing Target.

aa) Every document in the Key Evidence box has been amended and the Housing Needs Assessment deleted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S2 – Borough Wide Strategy

We object to Policy S2 on a number of grounds.

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. We believe this number to have been seriously overstated before the referendum but it is utterly without foundation now.

1. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound. The first line of the policy states that it will make provision for 13,860 dwellings or 693 p.a. over the period 2013-2033. The number given in Table 1 is 13652 for the 2018-2033 period or 910 p.a. and this is said to be an overprovision to demonstrate that the “target” can be met. The numbers given in the policy as targets for each of the years 2018-2033 add to 10,395 or 693 p.a. an apparent shortfall of 3,465 against the provision stated in the first line of the policy, or perhaps 2,200 allowing for those that will be built in the period 2013-2017. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15,860 houses. This is very confusing.

1. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London’s commuter belt. In this area the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken-this is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. The edge of urban Guildford will be moved much closer to West Clandon. It will be built on Green Belt land which was to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16303  Respondent: 8562561 / Mrs C Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1488  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent: Tibbalds Planning and Urban Design (Richard Crutchley)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Introduction

1.01 Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council. These representations relate to the June/July 2017 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 24 July 2017. Representations made by the Parish Council to the Local Plan consultation which took place in 2016 are assumed to remain valid.

1.02 This statement challenges the level of proposed housing provision in the parish, and focuses specifically on draft housing, employment and transport allocations in Send, Send Marsh and Burnt Common. It sets out objections to the following issues, designations, and allocations:

• Send Business Centre – inset from the Green Belt;
• Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic Employment Site”;
• Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of 7,000sqm employment floorspace;
• Site A42 – Clockbarn Nursery, Tannery Lane, Send – 60 homes;
• Site A43 – Garlick’s Arch (travellers and showpeople)

2. Proposed Allocations for Housing Provision

2.01 During the previous consultation in 2016, Send Parish Council set out that it considered the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Table 1 of Policy S2 set out the planned delivery of housing between 2018 and 2033. Sufficient allocations were made to deliver 13,652 homes in this period; an average of 910 dwellings per annum (dpa), or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan (2016) acknowledged that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to
build in flexibility. This, however, was well beyond the objectively assessed need of 693 dpa or 10,395 dwellings over the course of the plan period.

2.02 Send Parish were concerned that this resulted in the allocation of sites that were not suitable for development.

2.03 The proposed modifications rely on updated information in respect of housing need in the form of an addendum to the West Surrey SHMA. This has resulted in a reduced requirement; the objectively assessed need has fallen to 654 dpa. As a result, the proposed modifications remove some allocations and reduce the capacity of others. Whilst flexibility remains in the sites listed in the Site Allocations section of the plan, this appears to be at a more acceptable level of 9%.

2.04 However, Send parish specifically has not seen any reduction in the demands made upon it to deliver the housing needs of the borough and, in fact, the number of dwellings proposed in the plan has increased. Send parish also sees changes in respect of employment provision, and consequential changes to the green belt. These matters are dealt with in sections 4, 5 and 6 below. Distribution of housing 2.05 Send Parish Council also made comments during the 2016 consultation regarding the distribution of housing with reference to the 2014 Settlement Hierarchy document. There is no further evidence presented in respect of the Settlement Hierarchy in this consultation. Equally, nothing has materially changed in the settlements of Send and Send Marsh / Burnt Common that would warrant an update and, therefore, these comments remain relevant.

Distribution of housing

2.05 Send Parish Council also made comments during the 2016 consultation regarding the distribution of housing with reference to the 2014 Settlement Hierarchy document. There is no further evidence presented in respect of the Settlement Hierarchy in this consultation. Equally, nothing has materially changed in the settlements of Send and Send Marsh / Burnt Common that would warrant an update and, therefore, these comments remain relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: psp171/3518</th>
<th>Respondent: 8563169 / Send Parish Council (Debbie Hurdle)</th>
<th>Agent: Tibbalds Planning and Urban Design (Richard Crutchley)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. Green Belt Boundary

4.01 Send Parish Council object to the following alteration to the Green Belt boundary:

• The insetting of the Send Business Centre and adjacent field from the Green Belt.

The reasons for the objection are set out below.

4.02 The 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre from the Green Belt. This proposed insetting of the Business Centre from the Green Belt was included at this time on the basis that it formed a logical extension to the two site allocations located on Tannery Lane. These allocations were as follows:

• Site Allocation 67 – Tannery House and land adjacent to Tannery Lane – B1 employment uses;
• Site Allocation 75 – Land at Tannery Lane, Send (including Clockbarn Nurseries) – C3 uses, 215 homes.

The proposed Site Allocation 67 would have enabled an extension to the adjacent Send Business Centre. During consultation on the 2014 draft Local Plan, Send Parish Council made representations in respect of Allocation 75.
4.03 After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan. This draft version was submitted for consultation in Summer 2016. In this version of the Guildford Local Plan, the proposal to inset Send Business Centre was removed and the Green Belt washed over the site.

4.04 The Tannery Lane allocation (Site Allocation 67) was removed due to its location within high sensitivity Green Belt. The allocation at Send Business Centre was also removed [see paragraph 4.38 of GBC Topic Paper: Green Belt & Countryside for further details]. In addition to this, residential Site Allocation 75 was also removed from the draft Local Plan, replaced by Site A42. Site A42 allocated 45 homes on the site of Clockbarn Nurseries, a much smaller site than had previously formed Site Allocation 75.

4.05 Despite these reasons for removing the proposal to inset Send Business Centre from the Green Belt, the 2017 draft version of the Guildford Local Plan once again proposes to inset the site from the Green Belt. The area proposed to be inset from the Green Belt is significantly larger than the existing extent of Send Business Centre. In addition to the existing site of Send Business Centre, the area to be inset also includes the Business Centre car park and the adjacent undeveloped site previous proposed in the draft 2014 Local Plan as employment land Site Allocation 67.

4.06 Send Parish Council feel that the proposed insetting of Send Business Centre from the Green Belt is unjustified. Firstly, it is unreasonable to expect that the high sensitivity of the Green Belt in this location has altered since the Tannery House site allocation was removed from the 2016 draft local plan for this very reason. In addition to this, the River Wey Navigation Corridor, which sits adjacent to the Business Centre, is designated as a Conservation Area. The openness of this conservation area, and the setting of the River Wey within the Green Belt is an important feature of this high sensitivity Green Belt. Nothing has changed in the last year to the nature of either the Green Belt or the River Wey Navigation, thus it is not immediately clear why Guildford Borough Council have overlooked the ‘high sensitivity’ Green Belt designation in order to inset Send Business Centre and the adjoining land from the Green Belt.

4.07 Secondly, the Green Belt and Countryside Topic paper published as part of the evidence base for 2017 draft version of Guildford Local Plan states that the “unique nature of [Send Business Centre] and the existing infrastructure in place means it is considered appropriate for development”.

4.08 However, Send Business Centre is a small collection of buildings which enjoys a rural setting alongside the River Wey. It has consistently been regarded as contributing to the openness of the green belt by virtue of the designation washing over it. The existing infrastructure in place at Send Business Centre represents that typical of a Green Belt setting, namely single track roads with passing places and no pedestrian or cycling infrastructure. This does not constitute infrastructure ready to support an area inset from the Green Belt that, following removal from the Green Belt designation, will not be subject to the same restrictions as are currently in place.

4.09 No evidence is provided in the literature accompanying the 2017 draft local plan that justifies removing the Send Business Centre and adjacent land from its Green Belt designation. The Parish Council considers removing this area from the Green Belt an unsustainable precedent and could pave the way for significant inappropriate development in a rural area of high sensitivity Green Belt.

4.10 The proposed insetting of Send Business Centre and adjacent land is directly linked to the proposed change of designation of the Business Centre from “Locally Significant Employment Site” to “Strategic Employment Site”. Send Parish Council’s representations regarding this change of designation are laid out in Section 5.

4.11 Changes sought to make the Local Plan sound

- Remove proposals to inset Send Business Centre and adjacent land from the Green Belt. Restore the green belt wash over Send Business Centre.

8. Summary of Proposed Changes and Conclusions

8.01 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

- Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.
• Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
• Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt.
• Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.
• Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
• Remove Allocation A42.
• Reconsider the suitability of the Garlick’s Arch site for travelling showpeople given the site allocates a number of homes that is below the policy threshold.

8.02 Send Parish Council are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consultation events.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.11 Changes sought to make the Local Plan sound

• Remove proposals to inset Send Business Centre and adjacent land from the Green Belt. Restore the green belt wash over Send Business Centre.

8. Summary of Proposed Changes and Conclusions

8.01 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.
Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt.
Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.
Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
Remove Allocation A42.
Reconsider the suitability of the Garlick’s Arch site for travelling showpeople given the site allocates a number of homes that is below the policy threshold.

**Attached documents:**

**Comment ID:** PSLPP16/17422  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**S2 – Borough Wide Strategy**

**Report Page:** 7

**WHPC view:** Objects Strongly

**In brief:** WHPC objects to the borough housing targets of 25% increase in houses (against an ONS growth projection of 15%). Proposals is a 35% increase in village housing stock
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy S2: Borough Wide Strategy

Response: WHPC Objects to the borough housing targets set out in Policy S2.

The policy sets out an objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum (NOTE: the tabulated Annual Housing Target list in the Policy totals only 10,495 homes).

WHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. The growth rate differs substantially from that projected by the Office of National Statistics (ONS) which projects a population increase of some 15% for Guildford Borough over the same period.

WHPC has analysed the Land Availability Assessment (LAA) February 2016, and has identified a disproportionate bias in the location of homes proposed for Guildford's Green Belt villages. The results of the analysis are summarised in the histogram and pie charts below. The data for these charts is drawn from all the development sites detailed in the LAA and/or the Sites table in the Draft Local Plan.

The histogram shows the grossly disproportionate 35% growth proposed for West Horsley, compared to other parts of the Borough.

The two Pie Charts show by location the number of homes that will be built in the first 5 years of the Plan period and then over the full fifteen year period. The number of dwellings proposed for development on Green Belt land at 8,202 is extremely high (65% of the total no of homes set out on DLP pages 123 to 126), with 45% of these proposed dwellings to be built east of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
1. Introduction

The Parish Council OBJECTS to the Proposed Submission Draft Local Plan: strategies and sites June 2017

West Horsley Parish Council (WHPC) has reviewed the Proposed Submission Draft Local Plan: strategies and sites, published by Guildford Borough Council (GBC) for a 6 week public consultation to 24th July.

The Parish Council’s primary objections are to

(i) proposals for new Green Belt boundaries within the existing area of Metropolitan Green Belt and the ‘insetting’ of several villages from the Green Belt, including West Horsley and East Horsley.

(ii) the use of an unconstrained OAN figure of 654 homes per annum throughout the Plan Period.

(ii) the unsustainable characteristics of proposed development sites A37, A38, A39, A40.

The Proposed Submission Local Plan 2017 pack of consultation documents contains no proposals for provision of infrastructure for the proposed development Sites in West and East Horsley

(iv) the unsoundness of the Local Plan in many of its proposed policies and the flawed evidence base upon which policies are being promoted.

WHPC requires that the objections and comments contained in both this and our 17th July 2016 Submission are submitted to the Planning Inspector appointed by the Secretary of State to review the Guildford Borough Submission Draft Local Plan: strategies and sites following this Regulation 19 Consultation. The Parish Council will appoint and retain a representative or representatives to speak on its behalf at the Examination in Public of the Submission Local Plan.

The Parish Council also reserves its right to join with other parish councils to put forward their objections and case against many aspects of the Submission Local Plan at the Examination in Public when held by the Planning Inspector.

This submission focuses on changes made to the Regulation 19 Proposed Submission Draft Local Plan 2016. In the case of Sites A37-40, changes are minimal, thus ignoring the high volume of serious objections submitted by the majority of residents of the Horsleys to those Site proposals. The Removal of Site A41 from the Plan is welcomed.

The Proposed Submission Draft Plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. However, this is not reflected in any new wording or proposals for the Horsley sites, thus leaving local objections unaddressed. This failure to address objective responses by residents and the Parish Council, curtails the plan’s usefulness as a sensible and respected planning tool at a site level and further adds to its lack of credibility with residents. The Plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, shops, parking, schooling, medical facilities, sewage and flooding/surface drainage.

Section 2 sets out the Parish Council’s comments on and objections to the revisions to proposed Plan Policies. These are set down in tabular form alongside WHPC’s 2016 Consultation comments.

Section 3 focuses on the widespread criticism and concern expressed, not just by many West Horsley residents, but by the thousands of objectors to the proposed Local Plan at every Consultation since 2013. The dominant theme of objections since 2013 remains one of too many homes being proposed for building in the Green Belt.

The number of new homes has been promoted by the West Surrey SHMA and Objectively Assessed Number (OAN) prepared under a contract awarded by Guildford Borough Council to G L Hearn. GBC’s refusal, in response to many requests (FoI and other) to release details of the methodology and assumptions used by G L Hearn, on alleged commercial confidentiality grounds has been blatantly obstructive, falling far short of the requirements of NPPF Plan Making paras 155 and 157 in particular.
Along with a number of other parish councils, WHPC decided in 2016 to contribute financial assistance to Guildford Residents Association (GRA) to enable the appointment of Neil McDonald to undertake a critical review of the West Surrey SHMA and the OAN recommended by G L Hearn. Neil McDonald’s 2016 Review Report which uncovered errors in GL Hearns work, has been followed in May-June 2017 by a further Review of Hearn’s 2017 Addendum to the West Surrey SHMA.

McDonald’s Review of this Addendum to the West Surrey SHMA has revealed serious issues with Hearn’s data interpretation, resulting in an OAN that is too high. MOST SIGNIFICANTLY the Office for National Statistics endorses Neil McDonald’s findings.

Neil McDonald’s Review of the Addendum to the West Surrey SHMA is reproduced in entirety (with GRA permission) in Section 3.

[see attached document]

2. Parish Council comments on Sites, Amended Policies and Strategies

a) West Horsley Sites A37, A38, A40 and A41 and East Horsley Site A39

Lack of infrastructure / poor sustainability

WHPC and its appointed Planning Consultant put forward their reasoning in the Parish Council’s Submission Report on the 2016 Consultation, that the selection of these Sites in Green Belt locations without ‘exceptional circumstances’ having been proven, fails to satisfy the requirements of NPPF chapter 9.

Further, the sustainability of all the Sites was seriously questioned and found wanting, particularly in terms of the distance of each from Horsley station, shops, schools, medical centre, library and other services. The absence of a regular daily bus service through those parts of West Horsley that contain the Sites, was identified as a further factor that will generate considerable car use by residents of the proposed new homes on Sites A38, A39 and A40.

Referring to Table C of the AECOM Sustainability Appraisal SA Report Update June 2017, the Parish Council takes issue with a number of the Site Appraisal performance criteria, e.g. the distance from a Site to a Railway Station being measured on a straight-line basis. This is a nonsense for Sites A38 and A40, i.e. unless crows are going to buy / reside in the dwellings and fly to the station!

For Site A38 the distance to a Secondary School is categorised ‘Orange’ (less than 2km) yet A38 is further from a secondary school than Sites A39 and A40, both of which are categorised ‘red’ (more than 2km),

The Land Availability Assessment 2016 review of each of Sites A38, A39 and A40 includes the following statement (or similar) on Utilities:

Utilities

In response to the consultation on the draft Local Plan (2014), Thames Water advised that current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance, a drainage strategy would be required from the developer to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development. Thames Water will work the planned housing into their investment programme only once a site has planning permission.

Wastewater treatment provision will therefore be a delivery restraint for the proposed dwellings on this Site. WHPC met with Thames Water in May 2017 who confirmed that there were capacity issues at Ripley Sewage Treatment Works.

As a further and timely reminder of the lack of facilities in West Horsley (North and South), Appendix XII Greenbelt & Countryside Study Settlement Hierarchy is reproduced on the next page as a Summary Table with the Settlements shown in ranking order, rather than as the somewhat confusing alphabetical listing in the original Evidence document. Villages proposed for insetting from the Green Belt are highlighted in light red. West Horsley is ranked well down at 17th but
regardless of that position was targeted (note: not selected) to receive more new dwellings than any other village, before
the sustainability of each site and the cumulative impact on East and West Horsley had been properly, if ever, considered.

Though two sites have been dropped from West Horsley since the initial Local Plan Consultations were started in 2013,
the Parish Council, along with many of the village’s residents, has a strong belief that a proper evaluation of
sustainability has been fudged, simply to allow the remaining West Horsley Sites into the Submission Local Plan in a
desperate attempt to producing a Plan that is able to deliver a sufficient number of homes in the first 5 years, i.e. 2019 to
2024.

Local Plan first 5 years Housing Supply - comment

With the very obvious lack of infrastructure in West Horsley, recognised by the Parish Council and residents but
seemingly not or simply ignored by GBC’s Local Plan Team, the deliverability of all 255 homes planned for Sites A38
and A40, as stated in 2017 LAA Addendum by 2024 in the Plan Period’s first 5 years is seriously questioned. Why? The
housebuilders who hold the option on both Sites will adopt a steady building development programme which involves the
release of new homes in Phases that match the house build rate to what the market can take, without depressing the prices
of the various house types that will be offered. The new homes will not be cheap and that includes so-called affordable
units which will be priced at 80% of the local market average. West Horsley Parish Council will be surprised if each site
releases more than

15 units per annum for sale. Thus an 8 -9 years long building programme is highly likely, if realistic housebuilding
market criteria are applied to Sites A38 and A40.

Access to and beneficial use of the Green Belt, NPPF para 81

Collectively, the three sites in West Horsley North fail to meet NPPF paragraph 81’s encouragement of providing access
to and beneficial use of the Green Belt and its amenity and recreation value. This has been an outstanding success story in
the Horsleys. Assets, to name just a few, include a dense public footpath network visited and used by many walkers from
Greater London, parish parks, sports fields, a caravanning & campsite of international standard, Britain’s newest rural
opera theatre ‘Theatre in the Woods’ and the now, since the Local Plan process commenced, popular Olympics cycle
route. These examples of positive planning stem from a Local Plan that protects the Green Belt, maintains its openness
and beauty and avoids urbanisation and traffic congestion. Sites A38 to 40 are aggressively hostile to openness and the
character of the area, with a density of new housing that is completely inappropriate, being greater than anywhere in the
locality at present.

Proposed housing delivery trajectory 2019 to 2034 - illustrated

The housing delivery figures set out in LAA Addendum 2017 (page 8) have been plotted as two pie-charts, shown on the
next page, the key purpose of which is to illustrate very openly the very large percentage of housing proposed for Sites in
the Green Belt. No exceptional circumstances or reasoned justification is put forward by Guildford Borough on a Site
by Site basis.

A Histogram follows the pie-charts illustrating the housing figures from the 2016 and 2017 Consultation Local Plans for
(i) the Guildford town and urban Area (ii) Ash & Tongham (iii) the Eastern Rural area and (iv) the western rural area.
The histogram illustrates how the Rural Areas are disproportionateness targeted for new homes, all of which are proposed
on Green Belt Sites without any justification being put forward.

Land Availability Assessment Addendum 2017 - Corrections

i) Site A37 and its entry in the LAA Addendum 2017 is incorrect. The Bell & Colvill planning approval is for 9 homes,
not 6 as listed.

ii) It is not understood how in the Housing Trajectory – Sites with provision and phasing table on page 8, on the 3rd line
Outstanding capacity (Commenced) figures are filled in for the years for years 11 to 15 of the Plan Period.

[see table on attached document]
East Horsley District and Local Centres – Station Parade and Bishopsmead

Station Parade and Bishopsmead are explicitly identified as being suitable for “main town centre uses” which include amongst other uses “cinemas, drive-through restaurants, night clubs, casinos and bingo halls”. Clearly such uses are unsuitable and must be excluded from the proposed Local Plan by statements in Policies E8 and E9

[see charts on attached document]

b) Amended Plan Policies and Strategies

WHPC has chosen to tabulate its position on the 2017 Consultation alongside what it stated in its Executive Summary in the 2016 Submission Report -

<table>
<thead>
<tr>
<th>Policy No. and title</th>
<th>2016 WHPC comment in brief</th>
<th>2017 WHPC comment in brief</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016 WHPC position</td>
<td>2017 WHPC position</td>
<td>2017 WHPC comment in brief</td>
</tr>
</tbody>
</table>

S1 – Presumption in favour of sustainable development

Object strongly

Policy wording is flagrantly open, unenforceable and ignores the requirements of NPPF paras 7, 8, 10 and 17 in particular.

OBJECTS

No change in Policy wording.

2016 comment remains

S2 – Borough Wide Strategy: Planning for the Borough – Spatial development strategy

Object strongly

WHPC objects to the borough housing targets of 25% increase in houses (against an ONS growth projection of 15%). Proposals is a 35% increase in village housing stock

OBJECTS

Policy redrafted and drop in housing provision to 12,426 homes for Plan Period 2015-2034.

The housing target proposed, of 12,466 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure.

---------------------------------------------

Policy No. and title | 2016 WHPC | 2016 WHPC comment in brief | 2017 WHPC position | 2017 WHPC comment in brief |
| Sites Policies A37, A38 and A40 | All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies | Objects strongly | 2016 comments still apply |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Consultation Submission Final July 2017.pdf](#) (2.2 MB)

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/379</th>
<th>Respondent: 8565153 / Mr David Gianotti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- I object to the disproportionate amount of development in our area of the Borough;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- I object to the last minute inclusion of new sites;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5988</th>
<th>Respondent: 8565185 / Mr Dave Robins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17902</th>
<th>Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Urban Development

The Trust supports higher density development in the urban area where there is existing infrastructure, although that should of course avoid over intensification. Guidelines should avoid spoiling the environment and causing congestion but much can embrace fresh thinking on urban life including pedestrianisation, cycling lanes, home zones and underground parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18647  Respondent: 8565601 / Tyting Society (David Thorp)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Tyting Society is a Residents Association (RA) representing 88 local households. It is a member of the Guildford Residents Association (GRA), which represents 26 RAs and 4 Parish Councils. The Tyting Society endorses the response and objections that the GRA is providing to this current consultation.

The Tyting Society is also a member of CPRE. We support CPRE’s objections to the high level of housing building and that the constraints such as Green Belt and lack of adequate infrastructure have not ben taken into account.

We have two specific objections to the draft Local Plan

Level of House building

We object to the average annual target of 693 houses planned to be built over the period until 2033. The evidence for this is not soundly based lacking transparency and credibility. There are also significant infrastructure constraints that need to be recognised today and not at some ill defined moment in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/845  Respondent: 8565601 / Tyting Society (David Thorp)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Excessive Level of House building

We object to the average annual target of 654 houses planned to be built over the period until 2034. The evidence in the Guildford Addendum Report (March 2017) is not soundly based. This high number is modelled from the demographic needs within the Borough representing some 85% of the overall projected increase.

The new evidence from GRA’s independent expert shows there is an over estimate of population growth of about 40%. The GBC proposal will result in needless loss of Green Belt and increased congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4321  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large number of houses proposed for the Horsleys. Guildford Borough Council has not demonstrated the need for an extra 35% in West Horsley which is greater than any other area in the borough. The surveys undertaken by the parish council have not demonstrated either the need or the desire for an expansion of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3157  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/923  Respondent: 8569729 / Eric Payne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5 GBC have not followed correct process. There are significant changes in the sites suggested including slipping in new sites by the ‘back door’ The proposals for the housing requirements have gone up and down in recent years and it is not acceptable to try to use regulation 19 rather than the full consultation to which I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8113  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Overall, it is acknowledged that the Guildford Local Plan has made a significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period. In particular, the Plan makes provision for the delivery of 13,860 new homes between 2013 and 2033. This is equivalent to 693 new homes a year. In addition, the Plan identifies land to deliver about 1,984 new homes as a buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended. However, the Council would like to make the following detailed comments:

• Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meet the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1426</th>
<th>Respondent:</th>
<th>8569857 / Woking Borough Council (Ernest Amoako)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

Overall, it is acknowledged that the Guildford Local Plan has made significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period based on the addendum Strategic Housing Market assessment undertaken by your Council. In particular, the Plan makes provision for the delivery of 12,426 new homes between 2014 and 2034. It is noted that the original figure in the West Surrey SHMA is 13,860 new homes. This is equivalent to 654 new homes a year. In addition, the Plan identifies land as buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended.

However, the Council would like to make the following detailed comments:

• Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meet the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. It is therefore expected that Guildford Borough Council will use the Local Plan process to meet the unmet housing need arising from Woking Borough. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. Waverley Borough Council has just been through their Local Plan Examination and the unmet need from Woking was a key topic for discussion. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2073  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: “The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.” There are reasons for believing that the SHMA’s estimate of
the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMAThe report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2321</th>
<th>Respondent:</th>
<th>8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1.6</td>
<td>The direction given prioritizes development in Guildford town centre and urban areas, yet only 30% of housing is in these areas. It might be the 'preference' as stated in 4.1.6 but the reality does not match up with this and efforts to achieve growth in the preferred urban areas is lacking. The enormous level of objection to removal of 15 villages from Greenbelt (insetting) has been ignored and Greenbelt villages should be removed as a priority.</td>
<td>The policy must deliver and this one does not.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1.8 4.1.9</td>
<td>Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. These include: (followed by changes / Ash / Tongham)</td>
<td>The NEED has not been properly established as the SHMA produced by Neil McDonald shows. The need must be accepted before a plan can be formed / accepted by residents. This statement is NOT in line with the NPPF which affords some Greenbelt protection. No exceptional circumstances have been demonstrated to justify this level of development on these protected areas. It would be useful to add numbers to all sites and status ie Blackwell farm 1500 (in plan period) 300 after -- Greenbelt</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S2 1</td>
<td>to help meet the needs for new homes, support the economy and supply 3,200 additional class B jobs.</td>
<td>The justification has been removed. Whilst I agree that the plan as it stands is not justified, I do think an attempt should be made to justify the growth proposed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.19a</td>
<td>I object to the Annual Housing Target on a number of grounds It is too high and uses opaque methodology that focuses on the highest outcome. Known flaws in the SHMA have not been corrected and had they been, the annual housing number would be more like 400 a year, a figure that would be far more palatable to residents. No exceptional circumstances have been demonstrated to justify the level of development on Greenbelt land. The lower figure of 400 could perhaps be achieved with the parameters of the NPPF by focusing on pre--developed sites.</td>
<td>Object</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.

Buffers are already built into the housing number; this figure should therefore be reduced.

Land identified includes a very large percentage within Greenbelt; this should be removed rather than included to act as buffer that is not needed. Deliverability is dependent on a number of factors in addition to whether the landowner would like development (including access).

Access for Blackwell Farm is over AONB and there are serious traffic and pollution issues all of which make it difficult to see how this land can be considered 100% deliverable?

I am pleased to see the phased delivery but object to additional targets outside the plan period, for reasons, which have been explained. When Manor Park was removed from Greenbelt, it was with a caveat that no further land would be taken out during the period of the plan. This has been overturned and any importance given to the permanence of Greenbelt, ignored.

| 4.1.9b | I do not understand how the buffer is calculated, especially when it has been built in for different reasons throughout the SHMA too. Given that Guildford seeks to meet an OAN that is more than 20% too high in the first place it is difficult to understand an additional 20% buffer can be justified? | Object |
| 4.1.4 KEY EVIDENCE | Refers to the addendum, in which it states that the reduction in housing will not have an impact on the results of the traffic study and that in scenario 5, no significant impact will be seen providing the RIS works are carried out. It notes that without the RIS works impact will be severe. This is NOT true for the B3000 in Compton which will be severely impacted by increased traffic levels whether the A3 is improved / altered or not. In fact it will see MORE traffic if the A3 is improved as more traffic will use the B3000 to reach the A3. As the B3000 is likely to be recommended for an AQMA, it is important that this is highlighted and accounted for in the plan. The traffic modeling also underestimated traffic levels and hence it may NOT be true to say that changes in site allocation will reduce impact on traffic, although it may do. The traffic modeling should be done again, with the sites that will go forward and should input the suggestions by Mouchel to get more accurate readings. My understanding is that areas were split into zones and traffic modeled within the immediate zone. Blackwell Farm was in a zone of its own and hence the impact on Puttenham or Compton may not be properly reflected. Likewise, major routes such as the A3, A31, A281, A25, A320 etc would all be affected by development outside Guildford (ie Dunsfold, Object & Omission |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3259  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

First past the post

The hearing for the Waverley plan appeared to adopt a first past the post strategy, whereby Woking decided to protect its Greenbelt and hence declared it would not meet its OAN and the Inspector appears to have decided that this should be split between the two remaining authorities, who each have constraints of their own? Surely each should be considered on its own merits and constraints, otherwise the last one to touch base could end up with everyone else's unmet need, irrespective of whether it makes sense or not?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16196  Respondent: 8573505 / Anthony & Hazel Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The development of nearly 14,000 homes over a 20 year period is unsustainable without a complete loss of character to those centres included within the proposed extensions to various urban areas and villages. This policy does not appear to recognise these existing regions simply do not have the necessary road and other infrastructure capable of coping with expansions on this scale or magnitude and is therefore unsustainable. This excessive development appears skewed towards the northern sector of the borough. While Woking and Waverley are willing to apply constraints to their housing growth, Guildford is not and the uniqueness of villages such as Clandon, Ripley and Send appear destined to be enmeshed in an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We are writing to express our grave concerns about the revised Local Plan for Guildford that has now gone out to public consultation. That we need more homes, particularly of the right kind is undeniable. The first challenge for planners is to formulate realistic targets that local people can understand and be persuaded to accept with a fair degree of confidence as at least being both reasonable and sustainable.

GBC is proposing the total housing need can now be revised downwards from 693 to 659 per annum i.e. a reduction of 4.9%. Such precise figures imply specific calculations have been deployed against clear assumptions. However there is a complete reluctance to explain the thinking and methodology that has underpinned such an analysis. In any professional, technical or scientific document that goes out for peer scrutiny, there is a pre-requirement to provide some account of underlying principles used in reaching a particular conclusion. Otherwise the validity of the result must be considered suspect, flawed or inaccurate. This now has to be the view that any rational person must take over the figure of 659 new homes p.a. It is further reinforced when an independent analysis undertaken by GRA has concluded 404 houses p.a would meet Guildford’s projected needs. There is a 38.7% discrepancy, which should set alarm bells ringing! Perhaps as a university town, the statistics can easily be distorted by the inclusion of student numbers whose residency is at best transient and should not be included in any assessment of housing need for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am concerned about the implications of the Housing and Planning Act 2016 - particularly Section 150 and Planning in Principle. Planning matters such as detailed traffic assessment and sustainability are not being covered by the site selection for the Local Plan and are being left to the planning application stage. Under “Permission in Principle” it seems that these matters will be beyond public scrutiny and comment. Traffic assessments will be carried out by developers with a view to proving acceptability. Scrutiny by local residents is highly valuable in ensuring probity in the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object

51. Guildford Borough Council has no mandate to pursue such an aggressive growth strategy which uses an artificially inflated “housing target”. Constraints such as Green Belt and infrastructure have not been applied. I have commented on the SHMA earlier in my letter.

52. Why has Guildford Borough Council failed to apply constraints when it is happy to suggest that it values environment and separation of settlements?

I quote from the Strategy and Sites document:

“2.2.4 Guildford has its origins growing up where the River Wey flows through the North Downs ridge. This constrains development and creates a clear sense of separation between the town and outlying settlements, protecting the highly valued environment that is a distinctive part of the borough’s character.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly
calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework” . The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8065</th>
<th>Respondent:</th>
<th>8574369 / Douglas French</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I OBJECT to the Local Plan because Guildford Borough Council (GBC) has no mandate to destroy areas of the Green. The overwhelming majority of Guildford Councillors who voted for the Local Plan reneged on specific promises they made when seeking election to preserve the Green Belt. Conservative Councillors stood in the name of the Conservative Party whose official policy was and still is to preserve the Green Belt. This policy has been reaffirmed regularly. Guildford Councillors are therefore acting both unethically and ultra vires.

1. I OBJECT to the Local Plan because it does not reflect "localism" or "local decision making". It begs the question why any self-respecting councillor would choose to vote for the Plan, still less support it through public statements, when they know full well that they are not representing the wishes or expectations of electors who put them into office, that is local. It is a dereliction of democratic duty to squander hundreds of thousands of pounds of residents' money on such an ill conceived project which runs manifestly contrary to local opinion. Every councillor who voted for it should be considering their position and answerable for the money they have wasted.
1. **OBJECT** to the Local Plan on **procedural** Two of the sites in Send, Garlick's Arch and Send Hill, were not variations based on the earlier draft plan but completely new sites. Both should therefore have enjoyed a full new consultation under Regulation 18. This opportunity has been denied residents. In the case of Garlick's Arch, which is a very large site, this was introduced into the Local Plan absolutely at the last minute. GBC effectively sprung a surprise on everybody by producing it out of a hat having given no indication, as late as two weeks before publication, that it was even being considered. This quite definitely needed to go to a full Regulation 18 public consultation and GBC is in breach of administrative law in failing to do so.

1. **OBJECT** to the Local Plan because on so many issues the evidence base is questionable, defective, or totally The many examples of this are set out in great detail in the submission from Andrew Procter on behalf of the Save Send Action Group to which the reader is referred.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16189  **Respondent:** 8574881 / Melanie McLaren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to an area that at present has only 0.3% of the population of GBC).
- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5948  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy S2: Planning for the borough - our spatial development strategy

This restates the 13K new homes target, for which see below.

This section also effectively gives an expansion target for the Research Park. This commentator understands that the Research Park is a very high value contributor to the economy, and this is to be supported.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6976</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

S2 Borough Wide Strategy.

Object.

Over 80% of Guildford borough land is situated in the Green Belt and the Proposed Submission Local Plan (LP) housing numbers fail to take into account allowable constraints on new builds in the borough, caused by the green belt. Due to such a high housing target, over the plan period, the only way such large housing numbers can be accommodated is by taking too much land out of the Green Belt. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints based on the high proportion of Green Belt in the borough. Effingham Parish Council objects to the housing target – it is too high.

In addition, it is necessary to review the Strategic Housing Market Availability Assessment (SHMAA) concerning:

1. The part of the housing target driven by economic growth. Is this housing target still appropriate for the borough following the referendum result and the expected slower growth in the future? Given that an average of 125 new builds per year are due to economic growth this figure needs reviewing.
2. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fee Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.
3. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7189</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Object</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Over 80% of Guildford borough land is situated in the Green Belt and the Proposed Submission Local Plan (LP) housing numbers fail to take into account allowable constraints on new builds in the borough, caused by the green belt. Due to such a high housing target, over the plan period, the only way such large housing numbers can be accommodated is by taking too much land out of the Green Belt. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints based on the high proportion of Green Belt in the borough. Effingham Parish Council objects to the housing target - it is too high.

In addition, it is necessary to review the Strategic Housing Market Availability Assessment (SHMAA) concerning:
1. The part of the housing target driven by economic growth. Is this housing target still appropriate for the borough following the referendum result and the expected slower growth in the future? Given that an average of 125 new builds per year are due to economic growth this figure needs reviewing.

1. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fees. Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.

1. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the projected plan for new north facing slip roads to/from Send March/Burnt Common. The A247 from Old Woking through to Clandon is already over crowded with cars, etc, and this can only be exacerbated by increased traffic from all the new projected housing areas, ie A25, A35 A43, A43 and A44 a total of 4,484 houses, the majority of which will have at least one car. The Send, Send Marsh, Burnt Common and Ripley along with the A3 and the M25 are already very heavily used by traffic coming to and from Woking and Guildford. When these become congested for whatever reason, the problem is greatly exacerbated. On a regular basis it can take me up to five minutes to get out of my small road. The A247 is not a road that can be widened due to the housing on both sides of the road and is already subject to severe gridlocks during rush hours and school times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1249  Respondent: 8579233 / Mrs Purrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I feel that little thought has been given to the preferences of local inhabitants and while I can understand that affordable housing is necessary for many people I do not feel that country villages with poor transport facilities, overfull schools, considerable lack of medical facilities and constant traffic problems is the right way forward.

I look forward to your comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/565  Respondent: 8579233 / Mrs Purrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 - The 654 homes per year (total 12,426) number of homes the Plan intends to provide over the 19’ year period 2015— 2034. I understand that the target for housing has been reduced from 693 to 654 per year, but it is still much too high and does not take into account any of the constraints which should have been imposed due to the high proportion of the borough's designated Green Belt and the capacity of the roads, schools, doctors and other infrastructure to support such an increase in population. I object to the recalculation of assessed need for housing and other development and the grossly disproportionate impact of the Local plan's proposals on the more northerly communities of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Sites numbered:

A25 – Gosden Hill
A43 and A43a – Land at Burnt Common – known as Garlick's Arch
A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further. With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.

2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.

6. Other infrastructure. Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

7. Light and sound pollution.

   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.

   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.

   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perversive that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.

   It seems difficult to reconcile these two extreme positions.

   If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In terms of the housing requirement element of the policy we consider the figure to be unsound because it is unjustified. We are not persuaded that it fully reflects the objectively assessed need over the plan period.

The plan will make provision for 13,860 homes over the period 2013-2033. This is an average of 693 dwellings per annum (dpa) over the 20 year life of the plan.

We have considered the West Surrey SHMA of September 2015 and the Guildford SHMA Summary Report of October 2015. In general we consider this to provide a very robust assessment of the future housing needs of Guildford. The report very clearly explains the method that has been followed and the justification for the various adjustments. We would take issue on two aspects of the assessment. We concede, however, that the effects of these issues on the overall OAN may be quite limited. The overall conclusion that the OAN is 693 dpa seems reasonable.

We support the use of the DCLG 2012-based household projections as providing a sound starting point (see Key Messages on page 56 of the main SHMA report). This would be in keeping with the advice in the NPPG. Comparison with the latest DCLG 2014-based household projections which were published on the 12 July 2016 shows little movement in the underlying demographic component of the assessment.

We also agree that it would be sensible to adjust for the 2013 Mid-Year Estimates while retaining the 2012-based Headship Rates (see table 20 on page 66 of the main SHMA report). This results in a starting point figure of 517 dpa for Guildford (table 20 of the main SHMA).

We note however, that the new 2014-based projections show that 12,000 households could form between 2013-2033 compared to 10,000 or so projected by the 2012-projections (see DCLG Live Table 406: Household projections by district, England, 1991- 2039). This would suggest a new starting point of 600 households per annum. The difference may not be material since the adjustments made by the Council to the basic demographic projection would lift the level of supply to 693 dpa. Nevertheless, it is possible that the new 2014-based projections are suggesting a higher starting point for Guildford. This should be considered by the Council.

12 year migration trend

The HBF strongly endorses the decision not to apply a 12 year migration trend. We are becoming very concerned by the growing use of a 12 year migration trend elsewhere in the wider south east of England. As the SHMA Summary Report for Guildford argues on page 5, the problem with this scenario is that it would fail to account for changes in the age structure over time. These are changes captured by the latest 2011 Census and reflected in the new projections produced by the ONS and DCLG. The 2012 SNPP is likely to be more robust.

Unattributable Population Change (UPC)

We strongly support the decision not to adjust for UPC (page 6 of the summary SHMA for Guildford). It is unclear if UPC is related to migration, and the discrepancy may be because the way that the ONS measured migration was less robust in the past than now. A UPC adjustment for more recent data would be inappropriate.

London Migration
We welcome very much the Council’s acknowledgement of the potential impact of migration from and into London, including the Mayor of London’s own migration assumptions underpinning the new London Plan (adopted in 2015). As the SHMA explains the new London Plan was based on the 2011-interim household projections but assumed a 5% increase in out-migration and 3% decrease in inward migration (i.e. fewer younger people moving to London).

The Council has modelled a scenario that reflects these assumptions and this results in a starting point figure of 568 households per annum. While we accept that there is great uncertainty associated with the migration dynamics with London (see paragraph 2.9 of the SHMA summary), we consider that this will exert an effect on Guildford owing to the affordability problems in London. Relatively affluent households will be able to buy more space in Guildford than they can afford in London. Housing delivery in London is also averaging at only half of what is needed, and while Guildford is not responsible for this poor performance, the fact is that the dearth of supply may increase an outward migratory tendency that Guildford would be wise to prepare for.

For this reason we consider that it would be sensible to plan on the basis of the London migration scenario set out in Table 25 of the main SHMA: namely 568 dwellings per annum (table 25, page 72). We consider that the London migration scenario should be used as the basis for the demographic starting point to which the other adjustments should be made (affordable housing need, students, market signals).

It is interesting that this London migration scenario is closer to the new 2014-based household projection of 600 hpa. This suggests that the baseline demographic need before any other adjustments are made, may well be about 570-600 dpa.

**Economic needs**

As recommended by the NPPG we support the modelling by the Council to ensure that its new housing supply aligns with the employment needs of the Borough. This is a welcome and necessary measure. We note that the analysis has concluded that to support the projected growth in jobs in Guilford would require a housing supply of 637 dpa compared to the 517 dpa indicative figure in the trend-based projections (see paragraph 3.7 of the summary SHMA). The Council has concluded that the demographic need is around 120 dwellings lower than the forecast economic need and so has increased the housing need to 637 dpa (paragraph 3.7 of the SHMA summary).

We note that the adjusted figure of 637 dpa corresponds more closely to the new 2014-based household projection of 600 hpa. This suggests that an OAN figure that was any lower than the 600 dpa suggested by the DCLG 2014 projections would probably be flawed.

**Affordable housing need**

We support the uplift that has been made to cater for the affordable housing needs of the HMA. This results in an uplift of 59 dpa for the HMA, of which 20 dpa would be required in Guildford (paragraph 3.16 of the SHMA summary).

**Student housing**

The assessment of student needs is a very welcome and valuable part of the OAN assessment. The HBF has become very concerned by the failure of many authorities with higher education institutions to assess the projected growth of student bodies. This is because institutional needs are generally assumed to remain constant by the DCLG household projections. Therefore, a failure to account for a planned expansion of the student body could result in an under-counting of future housing needs. The SHMA avoids this by including an allowance for the growth of student numbers and a calculation of how this may impact on the need for C3 homes.
This is a most welcome and necessary adjustment. We support the approach taken and the adjustment that has been made to account for the growth of the student body. The adjustment adds a further 25 dpa to the demographic projection (paragraph 3.20 of the summary SHMA).

We refer to the Local Plans Expert Group’s discussion of this issue following the Government’s announcement in 2012 that C2 use class dwellings could be counted towards the housing completions. It invites the Government to clarify its advice on assessing institutional needs.

Market signals

We observe and support the adjustment for market signals. An adjustment for market signals is warranted in Guilford where the affordability to earnings ratios are extreme. The Council has made this adjustment by adjusting the household formation rates for the 25-34 age group. This results in a further addition of 11 dwellings per year. This is one way of accounting for market signals. The LPEG report has recommended an alternative approach, which if followed in Guildford, would require a 25% uplift to be made the baseline demographic projections because the lower quartile house price to lower quartile income ratio is 10.92 (paragraph 3.33 of the SHMA summary). However, the LPEG recommendation is made in the context of a far more simplified approach to the calculation of the OAN which removes the need for many of the adjustments currently suggested by the NPPG. In the case of Guildford we note that effect of the other adjustments made by the Council for employment, affordable housing, and for students would cancel out the effect of the 25% uplift which if applied to the base need of 517 dpa would only add 129 more dwellings per annum. This would result in a figure of just 646 dpa which is lower than the recommended OAN of 693 dpa.

Backlog

The NPPG invites local authorities to consider how past performance will have affected the household projections. As the NPPG states “formation rates may have been suppressed historically by under-supply and worsening affordability of housing” (NPPG, ID 2a-015-20140306).

Page 19 of the Viability Study illustrates the number of net completions achieved since 2006/7. Net completions in the period prior to this new Local Plan (2006 – 2013) were generally poor compared to the South East Plan’s annual average monitoring figure of 422 dpa. The SEP figure was achieved only once in 2007/2008. Although we recognise that the green belt review implicit in the SEP figure was the subject of a legal challenge and subsequently deleted, this was not necessarily the case with the SEP housing target for Guildford. In any case, this is the only benchmark available against which to assess performance unless one used whichever DCLG household projection was current at the time (all of which would have pointed to much higher levels of need). Table 3.1 shows that the average figure for the period was 250 completions per year. This figure is very much lower than any of the DCLG household projections so it is possible to infer that had completions been in line with the SEP then the DCLG household projections may have been higher.

The purpose of drawing attention to this is to lend further weight to our argument that the Council would be wise to plan on the basis of its London migration scenario since the baseline DCLG projections is likely to provide an under-estimation of future needs.

Conclusion

The HBF is broadly very supportive of the assessment made. We consider this to provide a realistic assessment of the future housing needs of the Borough. The only quibble we have is in the treatment of migration with London. We consider that there is a good case to substitute the London Migration scenario figure of 568 dpa instead of the 2012 SNPP based figure of 517 dpa as the initial starting point figure. This results in a difference of 51 dpa (see also paragraph 4.33 of the Duty to Cooperate Topic Paper). This should be rounded down to 50 dpa. After factoring in the other adjustments,
the overall OAN should be increased by 50 dpa to 743 dpa. A requirement of 740 dpa (rounded down) should be considered.

We recognise that in using this increased initial starting point this would not necessarily that has require the same increase for employment that has been made (120 dpa) except that it would be sensible to keep the same upward adjustment for employment as people moving from London to Guildford will probably still be employed in London – i.e. the adjustment for employment is necessary for those who will need to live and work in Guildford, not necessarily to cater for those living in the borough but commuting to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18718</th>
<th>Respondent: 8581089 / Jenny Wicks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2

I object to this policy. The housing number of 13,860 homes is excessive and the SHMA, from which the number is derived, seriously flawed, as demonstrated by critiques submitted by Guildford Residents Association and by Cllr David Reeve. In any event housing numbers and the employment land requirement need to be revised in the light of Brexit which reliable forecasters show will slow economic activity below levels previously expected.

The OAN has become the housing target because it is regarded as deliverable because, contrary to the NPPF, Green Belt (other than AONB) has not been regarded as a constraint, but rather as a bank of developable land, with 65% of the proposed homes being on Green Belt. The NPPF requires that established Green Belt boundaries should be changed only in exceptional circumstances and recommends, in the interests of sustainability, channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Proposing 65% of housing on the Green Belt is not consistent with this.

Also, it is clear that the lack of infrastructure, especially in the villages where individual developments will not be large enough to generate significant infrastructure, has not been properly taken into account in assessing the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3249</th>
<th>Respondent: 8581089 / Jenny Wicks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The revised OAN is too high. The proposed 22% increase in housing stock is double the 10.4% ONS projection for population growth over the plan period. The provision for students still seems unrealistically high as most will not stay in the Borough after graduation and the economic growth assumptions post-Brexit seem over optimistic.

No account has been taken of the special status of the Metropolitan Green Belt in limiting the ability of Guildford to meet its OAN. The Green Belt land proposed for development is predominantly in the land closest to London, in the north east of the Borough, of crucial importance in limiting the sprawl of the London conurbation.

The development proposed is proportionately (around 50%) too much concentrated on Green Belt sites in a small area in the north east of the Borough. Brownfield sites, particularly in the town centre, should take a greater proportion of the housing. With the growth of on-line sales, some of the area proposed for retail in the town centre should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/17547  Respondent:  8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to this policy on the basis that the strategic numbers vary from the calculations in Appendix 3, indicating that additional and independent calculations need to be completed. This is needed to confirm that such a large discrepancy above the national average is conclusively proven prior to acceptance of these figures.

It is also identified in Appendix 4 that there are insufficient skilled tradesmen in the area to complete the task of meeting housing numbers in this and adjoining Boroughs.

This policy is unsound as a basic Principle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/2254  Respondent:  8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is our assessment that the plan, in the round, presents a level of development for the borough that is unsustainable in its present format. Specifically, the plan fails to provide sufficient infrastructure to deal, in a sustainable manner, with Traffic, Water, Sewage, Air and Noise Pollution requirements. In broad terms when infrastructure is addressed in the plan the relevant references make such provision ‘generally optional’, encouraging mitigation measures as opposed to requiring the provision of specifically identified infrastructure, which is required to provide a realistic solution to the problems caused by the level of development set out in the Plan.
For instance, in relation to highways requirements associated with specific land allocations, road proposals in the plan have not been properly tested by or to Highways England requirements as set out in the Design Manual for Roads and Bridges. A specific example of this can be found in respect of the Gosden Hill land allocation: An allocation for development was turned down in the 1980s on this site, due to chronic lack of infrastructure, noting as an example [left] an extract from the GBC objection to the Gosden Site proposal, in which the council specifically noted the offer of a four way intersection but still found the allocation of a smaller section of the current proposed allocation unacceptable. This decision was supported by the local plan inspector at that time, and again in 2003. It would be reasonable to conclude that traffic levels have increased somewhat since 1984 and yet the current proposals for the Gosden Hill allocation makes only a passing reference to junction improvements south bound and make no provision or requirement for the all ways junction proposed in 1984, leaving all north bound traffic to travel south through the community of Burpham. NPPG paragraph 152 states “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” The failure to provide an all ways junction fails this basic principle. It is also worth noting the Council successfully challenged the Gosden Hill allocation in the former South East Plan on sustainability grounds in the High Court. There is nothing within the current proposals to suggest adequate levels of infrastructure will now be provided [see our separate detailed comments on Policy A25]. Therefore the proposal remains unsustainable and should be removed.

Notwithstanding the lack of sustainability, the plan’s ‘trajectory’ has failed to follow statutory process in that the introduction of new policies and background documents has occurred after closure of Regulation 18 and the Regulation 19 stages. No completed draft plan has ever been displayed to the public for consultation at Reg 19.

[Figure 1] Martin Grant proposal August 1984 (appeal against local plan)

[Page 30 4.1.9a]

The housing number within the table above,
450*2 + 500*3 + 550+600+700*3+800+810+850*3 does not calculate to 12,426 but 9,810 another indication that the Housing Numbers are fundamentally flawed.
Raw SHMA data has not been displayed to the public, contrary to the principles of open government [see closing comments at the base of this document]. The numerical data are not statistically sustainable. We therefore question the final figures in this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12192  **Respondent:** 8582017 / The Clandon Society (J Wright)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>PSLPP16/13488</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live...
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
double counting. It has not been produced in a transparent form with openness about
the data used by the Guildford Borough SHMA consultant, G L Hearn, and sub-
consultants used. It needs separate reports for issues in the SHMA which are relevant
for Guildford only, such as the large number of international students attending the
University of Surrey. The housing figure needs to be based on sound evidence.
Constraints need to be applied which are appropriate for Guildford.

Para. 4.1.5: It is written in this paragraph: “Our development strategy for the plan period is based on national planning
policy, with recognition of environmental constraints and the availability and viability of land for development.”

However, environmental constraints have not been applied as given in NPPF para.14 and footnote 9 as follows:
“……sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest;
land designated as Green Belt, Local Green Space, an Area of assets; and locations at risk of flooding or coastal
erosion”.

The housing figure has not been adjusted to allow for constraints. Indeed avoidance of development on areas prone to
flooding, for example, has meant instead more housing in the Green Belt, which is in itself a constraint.

The Minister of State, Brandon Lewis has stated: “We have repeatedly made clear that demand for housing alone will
not change Green Belt boundaries.”

Guildford is a congested gap town with steep hills rising up on either side and surrounded on three sides by AONB and
Green Belt. Its many villages are served by narrow country lanes. Traffic is a serious environmental constraint for
Guildford because of its topography, setting and heritage. Expensive infrastructure to widen the A3 will bring further
environmental impacts such as noise and over the plan period yet more traffic to cope with the extra 13,860 houses.
Narrow lanes cannot be widened without demolishing homes, destroying landscape and the character of village settings.

Constraints should be properly applied to lower the housing figure.

Para. 4.1.6: An over-abundance of retail on land which could be developed with housing is being proposed, in spite of
the decline in retail and its uncertain future. Some housing is needed in villages, but policies which in effect allow
unlimited growth are destructive to the Green Belt and to the character of villages.

Para. 4.1.7: Wording is needed in this paragraph and in the Local Plan to ensure that Rural Exception housing is for
those with a connection to the village who need affordable housing.

Para. 4.1.8 Constraints should be taken into account in this paragraph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2451  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally
Compliant? ( )
3.1 SPATIAL VISION

3rd para

The reduction in housing units for this plan period still necessitates three large developments to be built on the Green Belt, plus an increase to 2,000 houses within and around villages, some now inset from the Green Belt, based on a housing figure using flawed data.

The huge increase in traffic that will be caused by these developments on main roads which have reached full capacity and on local roads and lanes not built for heavy traffic, has been acknowledged, but the infrastructure solutions proposed in the Local Plan 2016 will not be sufficient to prevent congestion at peak periods. (SCC Traffic model – SHAR 2031 traffic forecast).

I object to the housing figure in the Local Plan for the above reasons

8th para, 2nd sentence

The large amount of retail has been reduced by a comparatively small amount of 9% to 41,000 sq.m. with some extra housing units added. Evidence as to the need for this amount of retail needs analysing carefully and the data used checked, particularly as retail is being adversely affected by the fast moving and increasing trend for online shopping. Consequently reports by consultants can be out of date.

Instead the Town Centre could be regenerated with housing, which would bring vibrancy to the town, stimulating Guildford’s economy by supporting leisure and eating places, and also the shops in the High St, the primary shopping street, along with its connecting passages.

I object to the over-large amount of retail proposed for the reasons above.

9th para

It is written that: “The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport especially through the town”.

It has been found that residents living in the town, 23% (GTAMS March 2015), were the largest group crossing the town, (ie from residential areas to hospitals, clinics, schools, after school activities, evening classes, leisure centre, sports grounds, University of Surrey, Surrey Research Park, cathedral, churches, colleges, out of town shopping, supermarkets, offices, railway stations, parks and so on.) It needs to be outlined whether public transport can be provided for residents and how they can be persuaded to use it. Some residential areas do not have a bus service and others have an infrequent service. (Buses are also an extra expense for those who own cars.)

I object to the loss of a central bus station, which gives the option of crossing town by changing buses.

A round town ‘Hop on, Hop off’ bus travelling to all sides of the town centre, stopping at the railway and bus station, would make all parts of the town centre more accessible. Such a bus would benefit residents, visitors and shops.

For the reasons above and to be taken in conjunction with my response to the 2016 Local Plan consultation, I object to the Spatial Vision.

POLICY S2 Box: Planning for the borough – our spatial development strategy

(1) The data used by G L Hearn Consultants to produce the 2017 Objectively Assessed Need (OAN) figure in the West Surrey Strategic Housing Market Assessment (SHMA) has not taken into account the report by Neil McDonald, an independent expert, which shows that the majority of students of the University of Surrey do not stay and live in Guildford, and do not raise families in Guildford, but move elsewhere to live.

The latest OAN figure written in the 2017 Local Plan is based on unsound data.
The revised figure does not apply constraints to the lower the housing number. Applying constraints to individual sites, means that if one site is restricted for flood reasons, etc, to fulfil the housing number, housing to replace it may be built in another restricted area such as the Green Belt, which is no longer being protected under Exceptional Circumstances from development.

See comment under Spatial Vision 8th para, 2nd sentence regarding retail expansion in the town centre.

I object to Policy S2 for the reasons above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6611  Respondent: 8585697 / Laurence Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Improved sewage works, enhanced transport infrastructure and improved air quality are a prerequisite to any future development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6620  Respondent: 8585697 / Laurence Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Planning for the Borough – Our Spatial Development Strategy  OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relate to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald. In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than the figures contained in this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6962  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
General observations

When I have attended Council meetings at Millmead on particular issues of concern to me, I have always been impressed by the quality of debate and general conduct of the meeting. The publications distributed about developments and activities in Guildford are also very positive and well received but despite this I regret to say that I do not have the complete confidence and faith in you, the Council, that I think I should. Nor do I have the feeling that you are on the same wave length in these matters as most of the people you represent. This probably stems from the way these planning issues are perceived. I well understand the complexities involved which in the main are dealt with very well but there is still some element that is missing. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist's impressions of how a development might look or any idea given of what an "affordable house" looks like
3. What is a traveller's pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed?
6. Residents should feel confident that the Council representing them properly reflect the feelings of the public
7. The villages in Surrey are a huge asset which development on the scale proposed in this local plan will change them into small townships many of which will be linked with ribbon development thus changing the character of the area for ever.

I am sorry if this sounds very negative but perhaps there is some value for you to know how someone feels about things.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15871</th>
<th>Respondent: 8586369 / Mr Luigi Fort</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived.
from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12269  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the proposal to build 13,860 homes in the Borough over the period of the Plan for the following reasons:

• The figures are from the SHMA but we are not privy to the calculations used to derive the required housing need of 693 dwellings per annum (dpa). The consultants who prepared the SHMA claim intellectual ownership and, despite FoI requests, the details remain hidden. We are told to trust the model because many other local authorities use it, a specious argument. GBC have presumably taken the report on trust which suggests a degree of naivety. There is significant concern, too, that the consultants’ website indicates an agenda that is clearly pro development.

• The OAN is 693 dpa but there is no Housing Target within the Plan. GBC seem to suggest the two are the same, that the OAN is deliverable and cannot be gainsaid. However, we understand that deliverability may be affected by various constraints. How can we be asked to approve a plan that does not actually propose a realistic target number that takes all constraints into account?

• An independent report by NMSS, commissioned by Guildford Residents’ Association (GRA), has arrived at a much lower OAN of 510 dpa. This report finds that the SHMA inflates the OAN due to

1. a) failure to correct historical data
2. b) issues with the way student needs are considered
3. c) flaws in the estimation of homes needed to support job growth.

• Other boroughs such as Woking and Waverley have applied constraints to overall housing growth, Guildford has not. There seems to have been little effort to protect the character of either urban or rural aspects of Guildford, already a very congested gap town. The unique identities of villages like Send, Ripley and Clandon are threatened with being lost as a result.

• There is a disproportionate level of expansion in the northern part of the Borough. This will impinge particularly on Burpham which would cease to be a definable village and diminish to just the name of an area
within the urban sprawl of Guildford. The planned development of Gosden Hill Farm offers the second largest number of homes, a new railway station, a Park and Ride, shops and primary/secondary schools, all situated in the Green Belt that includes an area of ancient woodland.

It is our contention that these deficiencies render the Local Plan unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15164 **Respondent:** 8586785 / Elizabeth Critchfield **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Poor documentation and lack of consultation time**

Six weeks is insufficient for most people to fight their way through thousands of pages to ascertain the aims and objectives of GBC and prepare a reasoned and informed response.

- The documentation is appalling. The language used is infelicitous to say the least and the presentation is poor; the use of white font on coloured background will have caused problems for visually impaired people.
- The website is cumbersome to navigate.
- The sheer volume of documentation is overwhelming – a literary equivalent of traversing the Himalayas. I would guess many people did not make it beyond the foothills. At the very least, some kind of summary as to the intentions of GBC should have been provided.
- Transport and infrastructure documents were released at the last minute and are incomplete.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15171 **Respondent:** 8586785 / Elizabeth Critchfield **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I can understand the need for economic development but it should not be at any price. This Plan seems to focus on expansion regardless of the harm done to the existing community. There are serious issues with regard to current infrastructure deficiencies which have not been addressed. They will not be solved by burying acres of Green Belt under houses and requiring the developers to pay for infrastructure in the faint hope that the rest of us might benefit.

A sound and sustainable Local Plan should surely have one major outcome – that most residents on reading the proposals can say “This Plan will do something to improve my quality of life.” On that ground alone, this Plan fails.

I have read the responses submitted by the Burpham Neighbourhood Forum, the Guildford Residents’ Association and the Campaign to Protect Rural England and am in agreement with them.
I note the housing need has been reduced from 693 to 653 per annum, a reduction of around 5%. As last year, there is a significant reluctance to elaborate on the calculations and assumptions that underpin this figure. An independent and open analysis of the housing need figure undertaken by a respected national expert has arrived at a much reduced figure of 404 homes per annum. That is a difference of nearly 40% - statistically extremely significant.

There is no doubt that more homes are needed - so long as they are of the right kind, providing for public sector workers, first time buyers and older people wanting to downsize, not the developer preferred money-grubbing high end of the market housing. However, the housing need figure must be realistic and its raison d'etre transparent. This is not the case and I therefore object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The draft Plan sets out at Policy SS2 a spatial development strategy; effectively, what type of development, how much of it, and where will it go. In respect of housing, Policy SS2 plans for 13,860 new homes over the Plan period (2013-2033). This equates to an average of 693 net new dwellings a year, and would meet Guildford Borough’s objectively assessed housing need (OAN) within its administrative area.

Guildford Borough Council considers that, in fact, the Plan will meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This provides 1,984 homes as a buffer. This is not planned over provision, but rather, flexibility that helps to guard against the policies in the plan becoming out of date by failing to deliver a five-year supply of available housing sites.

Guildford Borough Council does however make clear in the supporting documentation that it is unable to help with addressing unmet housing needs from within its own Housing Market Area. Rushmoor Borough Council is supportive of Guildford Borough’s commitment to meet its OAN within its administrative boundary.

In terms of the availability of housing sites, an interesting statistic to note is that 89% of Guildford Borough falls within the Metropolitan Green Belt. The Plan sets out in Policy SS2 a spatial hierarchy, which identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt. The following spatial options are then considered to be the most sustainable locations:
Guildford Borough contains some “Countryside Beyond the Green Belt”, although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph 4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.

Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.

In terms of any potential cross boundary impacts of this development, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford’s OAN.

Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the “duty to cooperate” on the cross boundary strategic issue of meeting housing needs.

Policy S2 (Borough Wide Strategy) contains reference to the identification of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople within Guildford Borough by 2017. A requirement for additional pitches and plots beyond 2017 is also recognised.

Guildford Borough Council is committed to meeting its identified needs for travellers within its administrative boundary in the first instance, which is important to Rushmoor Borough mindful of the fact that even though our Boroughs adjoin, we are cited in a different County. It is noted that in order to meet these needs, as well as some individual site allocations, such as at Sendmarsh and Effingham, the draft Plan requires in Policy H1 (Homes for all) that traveller accommodation should be provided on development sites of 500 homes or more. However, on land around Ash and Tongham, the individual housing sites that together comprise the allocation are individually less than 500 units, hence the policy requirement to provide traveller sites will not apply in this location. In this context, Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the SHMA figure of 693 houses per annum. That figure remains unsubstantiated. The south east is a magnet for people and any amount of development would remain insufficient. So – if you don’t build the houses, then people can’t move into this already overcrowded part of the country!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2: Planning for the borough - our spatial development strategy. We recognise and appreciate the reduction in the overall quantum of housing proposed for the Borough during the plan period (at c. 10%), but remain concerned for the long-term, cumulative impact this is will inevitably have on the Borough’s natural environment, as expressed through our previous responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1253  Respondent: 8591169 / Michael Bruton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

e. I object to the housing number overall and to the disproportionate housing numbers allocation to locations to the north and east of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13791  Respondent: 8591169 / Michael Bruton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2

1. No constraints have been applied to the housing numbers (e.g. Green Belt, Infrastructure, Air Quality issues adjoining all three major allocated sites).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13959  Respondent: 8591169 / Michael Bruton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2

1. No constraints have been applied to the housing numbers (e.g. Green Belt, Infrastructure, Air Quality issues adjoining all three major allocated sites).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17178  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would urge GBC to review areas of already developed land. The land around the Law Courts and Surrey Police headquarters is an obvious example where the buildings are unattractive and land is poorly used. Land at the Research Park and University is similarly not well used. Surface parking for instance could be decked, and interspersed with a mix of residential homes to rent or buy. The Plan does not explore these options in any detail. These sites should be looked at to maximise housing opportunities, enhance the built environment and improve land use – but without simply building higher.

The Local Plan does stress the need for protection of the Green Belt and I would restate the very high value local people place on this. So with these competing demands I welcome the ‘brownfield first’ approach to building, such as the regeneration project at Slyfield. Green Belt land, particularly where it abuts AONB, is particularly sensitive. I would highlight in particular the planned development at Blackwell Farm and the impact on the AONB and the Green Belt. I would draw particular attention to the statement in the NPPF where it says, “Green Belt boundaries should only be altered in exceptional circumstances”. I do not feel that this case has yet been made. However, there may have to be some Green Belt encroachment where there is local support in order to meet local housing need.

I congratulate Guildford Borough Council on producing a much improved Local Plan with a positive approach to the future of Guildford. We need more homes. We must drive developers and those that own land to maximise brownfield development and thus to protect the countryside as far as possible. As I have done before, I will continue to lobby Government for vital investment in infrastructure as, without this money, the number of homes we can build will be constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16135  Respondent: 8591521 / Mark Daniell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to A25 and A35 with the creation of up to 4000 homes. This increase in population will create a huge burden on local services and I question why this area should be used to meet more than its fair share of the new housing quota GBC need to build. Every evening the A3 is solid with traffic queuing to reach Guildford. This would worsen if the houses proposed are built. Such an increase in population would also lead to excessive traffic on subsidiary roads, including Send Road which regularly grinds to a standstill following RTAs on the M25 or A3. We cannot support the loss of working hours etc this would cause and the subsequent affect on the local economy not to mention quality of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3658</th>
<th>Respondent: 8591681 / The House of Commons (Paul Beresford MP)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

As the Mole Valley MP with a number of Guildford Wards in my Constituency I must acknowledge the great effort made by many thousands of Guildford Borough residents in contacting the Council and objecting to the latest draft of the Local Plan. This diligence on the part of people determined to protect the unique environment in which they live and work is heartening and encouraging to me as someone who has long campaigned on and fought for Green Belt protection. The proportion of protected land in these wards is of considerable significance.

I will not be addressing in great detail those many individual sites and proposals contained within the draft Local Plan which are highly contentious. I have read many submissions from constituents which do this perfectly effectively and I endorse and agree with these objections. The accumulation of these objections produces a picture in which residents of the Mole Valley Wards of Guildford Borough are united in opposition to what is proposed in the draft Local Plan - if any resident has written in support of the current draft I am not aware of this! I submit that a Plan which has drawn such an utterly negative response, even compared to the much revised 2014 draft, cannot be legitimate and must be withdrawn and reworked.

A reworked Plan would not simply be a matter of slightly altering some boundaries or numbers - at this stage it must constitute a wholesale realignment of thinking and direction of travel on the part of Guildford Borough Council. Central to this would be the Council acknowledging that the present figures for predicted future housing need, around which much of this Local Plan hinges, are currently too high and in light of the particular situation in Guildford Borough (the prevalence of Green Belt land) they must fight as hard as is needed to have these numbers brought down. In this they would have my full support and that of the huge majority of concerned residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3660</th>
<th>Respondent: 8591681 / The House of Commons (Paul Beresford MP)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
</tbody>
</table>
The approach to the plan should be to proceed on the acceptance that it has proved possible to persuade the Government Inspectors and hence the Government that because of the protections on such a huge proportion of Guildford Borough a lower target of housing numbers is acceptable. I personally believe and hope that the new leadership or GBC is more open, more receptive to new ideas and more creative than that which came before and that it is with the capacity or the council to craft a genuinely successful plan - but only if lessons are learnt and a genuine acceptance of the need for a change or direction guides council thinking from this point onwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLP16/12549  Respondent: 8592449 / Neil Huggins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Just a short note to say that I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/22  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy.

The proposed housing target is a more than doubling of the target since the Local Plan adopted in 2003 and is not supported by the evidence.

According to the 2012 Based SNPP, taking into account natural causes (births and deaths) and movement within the UK, the population of Guildford is projected to decline over the next twenty years. The entire increase in population is due to net international migration of which, according to the ONS, 57% are overseas students who would normally be expected to return home or move away from Guildford on completion of their studies.

Moreover the Household Projections are distorted by the very high proportion of young people in the population of Guildford due to the fact that (1) Guildford is a university town and (2) the permanent address of students is taken as being their term time address. Students are therefore taken as permanent residents of Guildford whereas in reality they move away from Guildford on completion of their studies. According to the Alumni Team at the University of Surrey, only 9% of former students live within the GU postcode.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3252</th>
<th>Respondent:</th>
<th>8593889 / Clandon Regis Golf Club (Sir or Madam)</th>
<th>Agent:</th>
<th>D &amp; M Planning Limited (Andrew Bandosz)</th>
</tr>
</thead>
</table>

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**LAND TO THE WEST OF SNELGATE COTTAGES, OLD EPSOM ROAD, EAST CLANDON, SURREY**

The site is in the ownership of Clandon Regis Golf Club, the land is surplus to the Golf Club’s requirements, and save for any proposed development scheme maintaining a reasonable buffer between it and the Golf Course, the proposal would not have any negative impact on the Golf Course.

*Policy H1*

In particular, H1 (9) seeks to make provision for self-build plots and custom housebuilding plots on smaller sites, yet the policy seems to focus and encourage more the provision self-build on strategic housing sites of 100 units and above, where a 5% allocation is sought.

It is contended, that more emphasis should be placed on facilitating self-build and custom housing provision of smaller sites coming forward for self-build housing.

*Policy H3*

Rural Exception Homes makes no provision for self-build housing as a way of securing starter homes on small sustainable sites in close proximity to existing settlement boundaries.

**Site Description and character.**

The site is located within the Green Belt, outside any Area of Outstanding Natural Beauty or Area of Great Landscape Value. The site is also outside the East Clandon Conservation Area. Whilst the Council have produced a Green Belt & Countryside Study as part of its evidence base for the Draft Local Plan, the application site is not identified in the study as being of any strategic value.

The site is within close proximity to the existing settlement boundary, and directly adjacent to a line of cottages known as Snelgate Cottages which front on to the Old Epsom Road, and which run parallel to the new Epsom Road.

[Image]

[Image]

The site is also behind a tree screen. The Snelgate Cottages, which number a row of 12 cottages, are located 90m from the settlement boundary and the Conservation Area of East Clandon.

The cottages, whilst pleasant in character, are of no historic merit and hence were not included in the Clandon Conservation Area.
The site itself is covered by shrubs and trees of very limited quality. The few mature trees that are present, are mainly around the edges of the site and could easily be retained as part of any redevelopment of the site.

**Access**
The site does not have a formal access point, although there is a pavement that runs for almost the entire length of the site’s frontage onto Old Epsom Road. The site has a frontage onto the Old Epsom Road of 80m, although the overall width of the site is 116m.

**Sustainability**
It is considered that the site is a well located, sustainable site for a small residential development and one that is well located to the existing local transport services that serve East Clandon. There are bus stops in close proximity to the site along Epsom Road, which connect to Guildford, Epsom and Leatherhead. The site is in close proximity to the village, with its local church, parish hall and local pub. Schools can be found in the neighbouring villages of West Clandon and West Horsley. West Clandon train station is a mainline station with connections to Waterloo and Guildford.

**Deliverability**
The site is in one ownership, no third-party land is required to achieve appropriate access for the development and there are no known constraints to the development of the site. The site could come forward and be developed within the next five years.

**Economic Benefits**
The site measures 0.5 hectares and is surplus to Clandon Regis Golf Club’s requirements.

The Golf Club opened in 1994 in 170 acres of land and hosts professional golfing events. However, the decline in the popularity of golf in recent years, has had a knock on effect on the number of annual memberships.

At the same time, increased costs of running the business, maintaining the extensive land holding, coupled with the general poor weather conditions experienced in recent times, has put a strain on the club’s resources. The redevelopment of this 0.5 hectare site, would enable the Club to generate a capital sum that could be invested back into the Golf Course business ensuring that it has the necessary funds to continue.

**The Proposal**
The indicative plan attached to this submission shows how the site could be sensitively developed with a low-density housing scheme. Sketch Plan SK01 shows a slightly more intense scheme that utilises the sites potential with housing to the rear of the site, thus making best use of the land.

[Sketch 1]

The scheme shows how a proposal of 14 dwellings, made up of 2 and 3 bedroom semi-detached and detached houses, could be achieved on the site.

The proposal would have a density of 7dph, and would include a buffer zone between the application site and the Golf Course.

The proposal would provide affordable housing at 35%, in line with current affordable housing policy, and would equate to 5 affordable dwellings provided on site.

Alternatively, and in line with the recently published Housing White Paper and the Government’s commitment to the Right to Build legislation, the site could be re-developed for self-build and custom build homes.

**Consultation with East Clandon Parish Council**
An initial approach to East Clandon Parish Council (meeting held 2nd February 2017) regarding the promotion of the site for housing, has proved relatively positive.
The Parish Council felt the site could accommodate a small housing scheme of smaller units and affordable housing. However, the Parish Council felt they needed more detailed information on the design, density and layout of the scheme, as well as more information on the affordable housing element of the scheme, to then consult with the wider parish members before the Parish Council could formally comment on the proposal.

Conclusion

In light of the site’s sustainability and the benefits the proposal could bring to the local area, it is hoped that the site will be included in the Site Allocations document that will accompany the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford_Local_Plan_Regulation_19_Consultation_Reps_July_2017.pdf (376 KB)

Comment ID: PSLPP16/12098  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Borough Wide Strategy

The West Surrey SHMA found that the housing shortfall in the borough was much greater than expected. It concluded that:

“Taking account of these adjusted household formation rates for younger households and adjustment for student growth, the SHMA draws the following conclusions on the overall need for housing across the HMA to be at 1,729 dwellings per annum with need in Guildford at 693 dpa.”

To make up for this shortfall, the plan makes provision for 13,860 new homes which would average 924 dwellings per annum. This is a higher level of development than experienced in Guildford borough during the previous Local Plan period and higher than the assessed need to build flexibility into the plan. The Annual Housing Targets set within this policy average out over the 15 year period at the required 693dpa but delivery is back-loaded to the latter years of the plan. Over the first five years a target of just 2,950 has been set which equates to a delivery of 590dpa. This is considerably less than the assessed need and therefore contrary to the requirements set out in paragraphs 47 to 49 of the NPPF.

• We consider that to comply with the requirements for a deliverable five year supply of housing land, the Council should promote additional sustainable smaller sites on the edges of existing settlements that would be deliverable in years one to five of the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17630  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  Agent: Strutt & Parker LLP (Rachel Patch)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

To meet the anticipated housing targets in the plan the Council should keep open the option of further sites coming forward within the plan period. We welcome the fact that the level of provision set out in the policy for each year is not set as a ceiling. There is no guarantee that every site identified for residential development will be developed over the life of the plan period and housing delivery should be subject to annual review. Further sites should not be ruled out for residential development should they come forward and be found acceptable in planning terms.
We support the provision of more employment accommodation. The Loseley Estate currently has a range of buildings under its control that are in active employment use.
We bring to the Council’s attention land that has the potential to make an active contribution towards housing provision and infrastructure provision in the Borough.

These sites are known as:
- Land Adjacent to Mount Brown, Artington (Possible Residential Use);
- The paddock adj. Sheiling (Possible Residential Use - possibly 100% affordable);
- Land adjacent to Artington Park and Ride (Extension to Park and Ride);

Please see accompanying supporting letter and accompanying location plans for further information on these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5635  Respondent: 8595905 / Mrs Jane Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am actually becoming heartily sick of writing with my objections, and I guess the council as a whole hope that this will mean I and many others like me will give up and go away. I objected with many others to size of the previous plans and your answer? To make an even bigger proposal for development. If this is what you plan, you must by law go through a full and proper process, not short cut the system and try to sneak things through in a way which is totally invalid and I object to the way in which this has been done.

I object to the number of houses you are proposing in our area and in others in the Borough. As far as I can gather, the number of homes the Council are planning to build in our area over the next few years far exceeds the need and would stretch the infrastructure and facilities to breaking point. It appears to be based on a report that none of us are allowed to see. Didn't we as council tax payers actually pay for this? Just because other authorities used this company to determine the need does not make it right or accurate. Let us see the basis of their figures as the secrecy surrounding it suggests they may well be unfounded.

I object to plans to build large new conurbations at Wisley Airfield, Gosden Hill and Blackwell Farm as I believe that the need for such large numbers of housing is based on an inaccurate, flawed or no longer relevant projections, and does not protect our local environment.

When are our elected representatives going to listen to what we are saying?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to strongly object to your so called revised Local Plan.

After all the time and effort I and thousands of people in the Guildford Area have been presented with a plan, which is almost a duplicate of the original plan and I wonder why GBC had to rent facilities in Guildford to present the plan only to restate your original thoughts, despite the objections.

The Gosden Hill Farm site, Wisley, Garlick's Arch, Send Marsh, Burnt Common and Ripley will produce thousands of extra homes and vehicles without the road infrastructure to support it. The A3 in particular is full to capacity already.

I have to say the consultants you employed do not appreciate the current traffic difficulties that currently exist. With the extra housing it would gridlock our villages and no one would get any benefits. The infrastructure of services including Hospitals would also be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Plan is flawed in places and confused.

GBC has totally failed to implement the Guidance set out in the NPPF with regard to using Greenbelt land for any development. In recent correspondence dated the 28th June 2016 the Minister Brandon Lewis said inter alia ‘The Government has put in place the strongest protections for the Green Belt. The Framework (NPPF) makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries’

Other guidance has emanated from the Dept. for instance one numerous occasions GBC has had cause to appear before the Planning Inspectorate in respect of land set aside for the Travelling Communities Sites in Normandy were dealt with by way of temporary and personal permissions being given to allow GBC to come up with alternative and suitable sites. In respect of Palm Nurseries a further application was called in by the Minister who made it clear that no further
development on the land was acceptable because the land was greenbelt, meeting all of the greenbelt standards but in particular openness.

Recent decisions on the question of sites in Normandy and Flexford are set out below for your ease of reference

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

1. It is clear from the Plan that an assumption was made from the start that Guildford needed to expand as a Regional Centre and as such the Brownfield sites in the town should be allocated to Commercial and Retail use. That assumption then turned into a presumption that it would need to build on the Green Belt to meet its housing target.

This presumption has led to building on the Green Belt becoming the main focus for development of housing. The Town Centre Plan is incomplete the funding for infrastructure falls far short of what is required to bring about such large scale development and yet the ‘balancing exercise’ of exercising constraints on the building proposed has purportedly been done.

They as such have not followed the NPPF with regard to the Greenbelt as constraint appears not to have been exercised in this regard by any measure. The question of ‘exceptionality’ or ‘very special circumstances has not been addressed in respect of any of the sites removing land from greenbelt, either by way of increasing ‘settlement boundaries’ insetting’ or allocating green belt sites to housing. Neither has it been addressed when removing land from urban development areas to create new green belt.

1. There appears to be no Heritage Site Assessment rather a MERE LIST OF Grade 1 and 11 listed buildings accessible (in theory) from Surrey County Council’s website. Indeed I found the information almost impossible to find and I am a retired lawyer! I would say that this would be necessary in order to consider any development proposals it is not sufficient to just raise this issue at Planning Permission stage (NPPF 126).

GBC hopes to remain an historic county town and be a centre for technological industry at the same time. In order achieve this it would need to have a top quality medium rise (8-10 story) technological centre, with workplaces, retail, leisure and flats, in an area offset from the town centre, Slyfield or somewhere similar. This would enable people to live and work sustainably.

The historic town centre should be preserved for retail, tourism, housing, particularly more one and two bedroom flats, and leisure. It would be cost-effective and sustainable, as there would be less need for expensive upgrades to transport infrastructure, as people would not be travelling in so much from the villages. The Town Centre would be transformed from being a ‘ghost town’ to one living and breathing with residents enjoying the arts, theatre, restaurant and cafe culture.

Taller buildings in Guildford will have to come, if not in this Plan, then in the next, or the one after.

This would leave the important Green Belt countryside available for farming, wildlife, tourism and leisure. Guildford is as much defined by its historical centre as it is by its greenbelt countryside and the greenbelt should be as carefully preserved as the historic town it surrounds. Much of Guildford history is found in its greenbelt countryside but the Borough Council seem unaware of this. In respect of Normandy and Flexford a very comprehensive assessment was provided as part of the Parish Council response but there is no reference ito it in the plan other than to highlight an area on Policy page A46 which is considered to be of High Archaeological Potential. Certainly no account appears to have been taken of it, One such property ‘Glaziers’ Grade 11 is within 25 metres of the proposed site at A46.

1. A further fundamental flaw is the amount of infrastructure improvement required to deliver the Plan, much of which is unfunded. Some improvements are dependent on external providers, the Highways Agency, Surrey County Council and Network Rail, who may have different priorities. I applaud GBC for attempting to tackle the problems that Guildford has with its transport infrastructure. I am not sure how successful they will prove
to be. Guildford is by nature a ‘Gap Town’, a route centre constrained by its geography. Many of the ideas for improvement of major pinch points cannot be delivered either because of this reason or because to do so would require land in an AONB or possible demolition of Heritage property. Further some of the proposals will simply not alleviate the problem

2. Another fundamental flaw is the amount of extra infrastructure developers are expected to fund. The bulk of these costs incurred by developers will be passed on to property buyers, driving house prices higher. A recent example of this type of development is found in the neighbouring Town of Aldershot. (13/P00108) There the developer has been made responsible for schools community facilities offices etc and the like. The 3850 properties that will be sold start at £395000 for 2 bed accommodation. 2 bed properties in Aldershot are presently £169,000 to £200,000

The plan is not sound in other places. I would draw your attention to:

Duty to co-operate

I can see no evidence that GBC have co-operated fully with Rushmoor Borough Council and Surrey Heath Borough Council. Both the Aldershot Urban Extension (AUE) in Rushmoor and the Princess Royal Barracks (PB) in Surrey Heath will impact on GBC’s transport strategy and housing numbers. Although both Authorities are mentioned, both in the Transport Strategy and the West Surrey SHMA, it is not clear where data concerning these sites has been fed into either Transport or Housing policies.

Duty to Consult  The plan is presented using at times impenetrable language and with confusing contradictory information (eg Settlement Hierarchy and Sustainability report for Normandy Flexford see later)

It is inconsistent in approach for instance see A49. The policy fails to acknowledge that present occupation is temporary and personal only. That the SOS has indicated already this is not an appropriate use of the greenbelt. The Borough has also failed to provide in its policy statement despite having done so in other A Policy documents ‘and must remain in perpetuity as Traveller accommodation whilst there remains an identified need for Traveller accommodation in the borough’.

One can only speculate that this is because they are aware they have failed to enforce the personal permission aspect of the present occupation knowing that the sites have been occupied mainly by eastern European workers who are not members of the travelling community but are mere sub lessees. The point is that it is impossible to find this provision elsewhere and one is left floundering on the question of how to respond and properly object. The Evidence base has changed frequently without highlighting and there are masses of it

The amount and complexity of the documentation is such that it is not appropriate at this stage to allocate the minimum recommended time to the consultation process of just 6 weeks, especially as for Normandy and Flexford the changes have only been suggested in this plan and not mentioned in previous consultation. Indeed I say that in respect of all of the changes at Normandy and Flexford this consultation should be a S118 consultation not a S19 one

Late inclusion of Policies A43 and A46 and Insetting in Normandy and in Flexford

These sites were not included in the last version of the Plan. They were not announced until April 2016. This is the first time residents have been able to comment on them, and have had very little time to consider their responses. GBC have been aware of A46 since 2014. Cllr Paul Spooner had the opportunity to engage with Normandy residents on A46 when he addressed Normandy residents in April 2016, but chose not to take it. The NPPF is quite clear that there should be early and meaningful engagements with residents.

During the last consultation the vagary of the maps made it impossible to respond to the proposal to ‘inset ‘the present homes in Normandy and Flexford to the extent that area has been altered, because it was simply not clear. The Parish Council complained of that but no effort was made to respond and the summary prepared by the GBC of the objections was not full and complete

Failure to meet the principles of the NPPF
There are places where the GBC Submission Local Plan does not meet the principles set out in the NPPF and these are dealt with below in context.

In particular, GBC have not met either its own policies on Biodiversity, found in Policy 14, nor those of the NPPF paragraph 14. There will be a significant net loss of Biodiversity if this Plan goes ahead in full.

**Paragraph 119 NPPF** is also disregarded with its guidance that “the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring assessment under the Birds or Habitats Directives, is being considered, planned or determined”. Guildford surely needs to recognise this strategic policy in view of its close proximity to the Thames Basin Heaths.

The GBC Spatial Vision states "Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough’s biodiversity". This is disingenuous. GBC plans to use 467ha of land that is either farmland or other green space for building. Against this it is creating 249.8ha of mixed use Suitable Alternative Greenspace (SANG) a net loss 218.2 ha of fields and other green space.

**THE EVIDENCE BASE**

You ask if the evidence base is adequate, up-to-date and relevant. I have objections to parts of the three documents below.

I also object to the fact that it seems apparent there is no Heritage Sites Assessment (as referred to above), there being 22 such sites in the Administrative area of Normandy. There are also 4 sites of Archaeological potential one of which is of National importance and another still under examination.

- Transport Strategy and Settlement Hierarchy & Settlement Profiles

**In the GBC Transport Strategy I object to;**

**Local Roads Network Strategy.**

Major external developments have not been sufficiently accounted for, leading to flaws in the strategy on Local Roads in the West of the Borough. The AUE, 3,850 homes, and PRB, 1,200 homes, are already under development and significant traffic flows to and from Guildford will result. The AUE is predicated on many residents using the car. Local Roads affected will be the A323, A331, B3411 and also the A31. To this is to be added 1,300 homes in Ash and 1,100 in Normandy. The effect on these local roads will be severe. One has to question whether the additional traffic anticipated by the development in AUE and PRB would lead to gridlock as there are already too many problems experienced on the A323 and A31.

Improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Judging from the sum to be spent, £6.6m, improvements will be minor. LRN9 -LRN 13 and LRN 18-LRN19 will deliver improvements between 2017 and 2026. The A323 is especially vulnerable, being a narrow A road with no opportunity to widen it along its length. Large queues already form at peak time at junctions. The planned improvements will be delivered well after the first commuters travel from the AUE and PRB to Guildford.

There will be resulting pollution and longer journeys, frustration for motorists and inconvenience and potentially health issues from traffic pollution for villagers. GBC has not produced a strategy that deals with the quantum leap in commuters from the new developments in West of the Borough and external developments.

More Information in Annex A

- AM4 delivery 2020 - 2024.
The Christmas Pie Trail runs from Wood Street to Farnham. The surface is unmade and unlit. It is muddy in winter and narrow where it passes through woods. There is little scope for lighting and improving the surface at the Wood Street end, as it runs through Broad Street and Backside Commons, which are both SNCIs. It is unsuitable for year round travel.

I object to the housing target in the SHMA

I would have liked to have been able to understand how the housing target is calculated. Requests have been made under FIA for information about the modelling etc but this is not to hand in time for the Consultation process.

I accept that the owner of the model that calculates housing need wishes to protect their intellectual property. I do not believe that GBC should accept the findings of the model just because other Authorities have. I would have liked to have seen the input that GBC submitted for the model. A summary of the test scripts run by the developer to show that the model delivers correct results should have been made available to the Borough Council and to those of us who are in a position to check it.

There have been a number of alternative studies carried out, entirely due to the fact that the GBC have refused to work openly with the community on this issue. The GBC used public funds to commission the work of GL Hearn yet failed to put in place proper checks to allow them to comply with their duties. On that basis I would urge you to rely instead on the study produced by ‘Green Balance’ instructed by Compton Worplesdon Parish Councils and by the CPRE

I do not accept and OBJECT STRONGLY that the numbers produced are an accurate reflection of a truly objective housing need in the Borough

To what extent have GBC engaged with Rushmoor and Surrey Heath? The AUE is 500m from the Guildford border. Have the AUE and PRB been taken into account when calculating the housing numbers, especially as they are intended in part for people who work in Guildford?

Furthermore I object strongly to the treatment of the students from the University of Surrey. Surrey University have failed to deliver promises to house their students in accommodation built on their extensive land holdings. Manor Farm was removed from the Greenbelt in 2003 with a promise to do so and GBC seems to think it is acceptable to agree they should only house 60% of their students on site. Given Guildford almost traditional role as ‘domatory town’ it should be 100%. There is plenty of room for development. Instead considerable ground is wasted both at the university and on Manor Farm for open car parking

I object to the flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

The Administrative Area of Normandy is made up of five hamlets, of which Normandy is one.

The Settlement Hierarchy and Settlement Profiles;

- Confuse Normandy with Wider Normandy (referred to rather quaintly as Greater Normandy by GBC)
- Ignore two of the hamlets, Willey Green and Pinewoods
- Consider Flexford to be part of Normandy, although they have been informed that this is not the case
- Consider Normandy and Flexford as being one settlement when it suits their case, and as two when not
- Claim that Normandy would benefit from shops, with no proof. How up-to-date is any evidence that GBC are using? Is it pre-superfast Broadband? Why have they ignored the reported result of the Household survey carried out for Normandy PC
- There are 10 errors/omissions in the Settlement Profile for Normandy/Flexford. For example; GBC state that we have one SNCI in Normandy when there are eight: a Scheduled Ancient Monument of National Importance which lies partly in Flexford is omitted.

I object to the fact that there is no Heritage Sites Assessment

even though there are 22 Grade 11 listed buildings in the area 8 of which are sites on the curtilage of Site 46. One of these was occupied till his death by John Cobbett
There are also 2 sites of high archaeological potential and a site of National importance (mentioned above). More information in Annex B

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12530</th>
<th>Respondent: 8596897 / Roseacre Gardens Residents Assoc. (Peter Stage)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Unfortunately box ticking number counting of objections plays a disproportionate part in the process (in addition to the legitimate planning etc. objections of which there are many - already made and to be made). EG. nature and character of a unique environment which is worthy of special protection to name but a few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1647</th>
<th>Respondent: 8597761 / Mrs Pippa Fleming</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

28. I object to the allocation of sites in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15578</th>
<th>Respondent: 8597793 / Pirbright Parish Council (Lindsay Graham)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Policy S2 Borough Wide Strategy and Spatial Vision**

The need to provide for the housing, employment and infrastructure needs of the Borough is understood and supported, which is important in ensuring the quality of life and availability of life chances for all of the Boroughs current and future residents, but given that the effect of this on the environment and quality of life within the Borough, care needs to be taken to ensure that the level of provision is no more than is necessary to meet those needs. Hence Pirbright Parish Council would ask for the housing and other proposals set out within the Plan be further reviewed to ensure that:

- the level of housing and other development proposed is no more than is necessary to meet the needs of the Borough (and the demographic model giving rise to the housing forecasts is fully tested);
- that the scale and location of housing and other development proposed is the most sustainable possible in terms of its location and distribution;
- should ideally be concentrated within and around the main towns to reduce the need for car travel and promote sustainable patterns movement using pedestrian, cycle, bus and rail;
- that preference is given to brownfield sites where they are sustainably located and would otherwise be acceptable;
- should have regard to the need to protect the character and quality of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2605  **Respondent:** 8597825 / Mr P J Colborne-Baber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing numbers that have been suggested have not been substantiated as requested and therefore most of the suggested development sites should be removed. I am not saying no development but it has to be in line with the facilities and infrastructure that exists. Words to imply that infrastructure will be improved with absolutely no detail or time schedules is quite unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLP16/16097  **Respondent:** 8598561 / Sarah Belton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to law, for which none exist in this area. Urban development is not an exceptional circumstance, nor is lining the pockets of developers. Any weakening or exceptions made to green belt protection will lead to its ultimate demise, and once it is gone there is no going back. The green belt must be protected in its entirety in perpetuity as the law intended.
Developers avoid brown-field sites as the location may be less desirable and cost of development can be higher, resulting in a lower rate of return. There are many such sites in the Borough which it should be mandatory to develop before any other sites are even considered.

I will be accused of not wanting development in ‘my own back yard’, but my concerns are more far reaching than my local area. I believe the south east of England is at capacity, and want to see vision and innovation in development practice for the future good of all. Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is noted that policy S2, Planning for the borough – our spatial development strategy, of the Local Plan, intends to meet a housing need equivalent to a level of 654 dwellings per annum. This is the figure set out in the Land Availability Assessment (LAA) Addendum (June 2017).

However, it is not the figure set out in the Final West Surrey SHMA (September/October 2015), which identified an overall need for housing over the 2013-33 period for Guildford of 693 homes per annum. This document was prepared by GL Hearn on behalf of Guildford, Waverley and Woking Borough Councils jointly.

Runnymede Borough Council is concerned that Guildford is not proposing to meet its full OAN, with consideration therefore having to be given to the question as to whether the Plan is unsound on that basis, notwithstanding that there has been some joint working with Waverley and Woking in pursuit of the Duty to Co-operate.

Moreover, as Runnymede is not yet in a position to be able to confirm that it is able to meet its own housing needs in its emerging Local Plan, ‘Runnymede 2035’, this Council will continue to request assistance concerning this matter from Guildford (and, indeed, from other Local Planning Authority areas).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17288  **Respondent:** 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)  
**Agent:** JB Planning Associates (John Boyd)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

Representation on Policy S2: Borough Wide Strategy & Table 1 – Proposed Delivery between 2018 -2033

**Introduction**

This representation relates to the Guildford Borough Proposed Submission Local Plan Strategies and Sites document. Representations were previously submitted at the Regulation 18 stage in November 2013 in relation to the Guildford Borough Local Plan Strategy and Sites Issues and Options document and in September 2014 at the Draft Plan stage.

In terms of Local Plan preparation, the Guildford Borough Draft Local Plan: strategy and sites document (2014) set out the Council’s preferred options for growth. Our client’s site at land south of New Pond Road, Farncombe was identified as part of a residential allocation (number 80) within the Draft Local Plan. It was also proposed that the land be removed from the Green Belt and the Green Belt boundary re-aligned.

The 2014 Draft Plan contained the following reference:

“4.113 In accordance with national policy, Green Belt boundaries need to follow defensible lines that are easily recognisable and likely to be permanent. This includes for instance roads, railway lines, woodlands and hedgerows. We have reviewed and followed the recommendations of the GBCS with the following amendments…:

Farncombe: we have identified a development site that adjoins the settlement of Farncombe and land reserved for future development in Waverley Borough Council’s Local Plan 2002. We will continue to work together to progress this land over the plan period”.

The previously proposed draft allocation comprised of three main parcels of land. The furthest west is the site that is the subject of this representation (Countryside Properties land). To the east is land associated with New Pond Cottage and
New Pond Farm. The furthest east is land promoted by Black Onyx on behalf of the Podger Estate. Countryside Properties are cooperating with those with an interest in the land.

Deliverability

Paragraph 14 of the NPPF emphasises that:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

For plan-making this means that:

local planning authorities should positively seek opportunities to meet the development needs of their area,

For Local Plans:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or
- Specific policies in this framework indicate that development should be restricted…”

Paragraph 47 of the National Planning Policy Framework (NPPF) focuses on the requirement of Local Planning Authorities to significantly boost the supply of housing.

The footnotes associated with paragraph 47 of the NPPF states that for a site to be deliverable, it needs to be available, in a suitable location and viable. It is required that a site is achievable and that there is a realistic prospect of it coming forward in the next five years.

Countryside Properties confirms that the land south of New Pond Road can be delivered within the first five years of the adoption of the Guildford Borough Local Plan and contribute around 90 dwellings to the Borough’s 5 year housing land supply with an estimated average construction rate of about 30 dwellings per annum.

Local Authorities are required to work together to ensure that housing requirements across the whole Housing Market Area are addressed.

The Council identifies the key pieces of evidence base relevant to housing as being:

- West Surrey Strategic Housing Market Assessment (SHMA)
- Green Belt and Countryside Study (GBCS)
- Land Availability Assessment (LAA)

SHMA

The final joint West Surrey SHMA (September 2015) indicated that the objectively assessed housing need (OAN) for Guildford borough is 693 homes per year, or 13,860 dwellings over the Plan period (2013-2033). The annual figure consists of a demographic requirement of 517 homes with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability issues (paragraph 4.3 of the Housing Delivery Topic Paper [HDTP]).

The HDTP states (paragraph 4.4142) that the Council consider it can meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This is identified as including a buffer of 1,984 dwellings, rather than over-provision. Clearly, not all sites will come forward as expected during the plan period. Furthermore, we believe that in reality the Council lacks the housing supply buffer it claims to exist. We set out further below that we also consider that there are serious deficiencies in the SHMA in terms of the overall OAN identified, and that we consider the actual housing requirement figure to be higher.
 Whilst Waverley is currently progressing its Local Plan, which aims to meet its OAN, there is currently unmet need arising within the HMA from Woking Borough Council. It has an adopted housing requirement of 292 dwellings per annum (2010 – 2027) against an OAN of 517. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes (paragraph 4.4 of the Housing Delivery Topic Paper).

NLP – Review and Critique of the West Surrey SHMA

NLP have prepared a review and critique of the West Surrey SHMA. Below we set out the key findings of the assessment. The full report is attached in Section 2 Appendix 1 of our representations.

Paragraph 3.5 of the NLP report refers to the fact that the SHMA models three alternative demographic scenarios as sensitives to the 2012 SNPP (para 4.62)

- a 12 year migration trend,
- a scenario which makes an unattributable population change (UPC) adjustment; and finally
- a scenario which takes into account the London migration patterns planned for in the adopted London Plan (2015).

However, the SHMA discounts the outcomes of these scenarios and concludes on the 2012 SNPP scenario as the demographic starting point for the West Surrey HMA. NLP considered this approach to be wrong.

NLP also concluded that the SHMA fails to properly consider the issue of London migration. It points out that the housing targets within the Adopted London Plan (2015) are based on a ‘central variant’ population projection produced by the Greater London Authority (GLA) which assumed migratory outflows from London will increase by 5% and inflows to London will fall by 3% compared with recent trends over the recessionary period (i.e. those that have informed the 2012-based SNPP). These assumptions have formed the basis for the London Plan, with the Examination Inspector ‘signing off’ these assumptions, inferring that they are likely to happen (paragraph 3.8).

Paragraph 3.9 states that:

“The London Plan (2015) deviates from national projections and, as this assumption influences migration at a national level, this needs to be taken into account. West Surrey’s location within the wider South East means that any assumptions around fewer people moving to London and more people leaving London (some of which to West Surrey) will result in increased population growth and housing need within the HMA as a whole. This will be of most significance to Guildford where historically there has been substantial out migration from Guildford Borough to London. As London is not planning to meet the needs of all of the migrants to London as is currently modelled within the 2012 SNPP, Guildford will have to consider how it will accommodate its current residents who will not be planned for in London. When these assumptions are applied in the London Migration scenario, Guildford has a housing need of 568 per annum (Table 25 of the SHMA), compared to 517 per annum under the 2012 SNPP scenario. Taking into account the London migration assumptions inherent within the adopted London Plan (2015), Guildford needs to plan for 51 extra dwellings every year, over the plan period this is more than 1,000 homes. For consistency across the HMA, the outcome of this scenario for the HMA as a whole is an additional 60 units per annum over the plan period”.

The above finding is very significant. It demonstrates that over the course of the plan period Guildford would need to find provision for an additional 1,020 dwellings, and that across the HMA as a whole, a further 1,200 dwellings will need to be provided.

The use of different economic scenarios has been questioned by NLP (paragraph 3.21). It has pointed out that a different economic scenario has been used to determine associated housing need in Waverley (recent trends / the LPA’s economic strategy, whereas the economic scenario used for Woking and Guildford is based upon forecasts. As a consequence, the employment growth assumptions are not being made consistently across the HMA.
There is a clear danger that the use of different economic scenarios might result in the failure to ensure that the total number of jobs and their associated housing needs across the HMA are adequately provided for.

NLP states (paragraph 3.25) that it does not consider that the SHMA has suitably addressed the need for a market signals uplift in West Surrey and its adjustment is not compliant with the requirements of the PPG. It reports:

“...To make an uplift for market signals, the SHMA runs a sensitivity scenario to the demographic-led projections whereby the household formation rates amongst the 25-34 age group improves, such that rates return to their 2001 level by 2033 (para 7.53), i.e. it is assumed that more people in this age group will form their own households rather than living with their parents or in house shares. The SHMA concludes that making this adjustment to headship rates would result in the need for an additional 98 dpa on the demographic-led needs or 100 dpa on the economic-led needs (Tables 53-55). In either case this represents a 7% increase/uplift on the starting point across the HMA to address market signals. The SHMA appears to conclude (para 7.58) that this level of uplift is reasonable and would secure an improvement in affordability”.

Reference is made (paragraph 3.30) to the Eastleigh Planning Inspector concluding that a modest uplift of 10% is a reasonable proxy for quantifying an increase demographic based needs to take account of ‘modest’ negatively performing market signals. Whereas, more recently the Canterbury Inspector accepted a 20% uplift for ‘more than modest’ market signals pressure. This represents a more appropriate starting point for considering uplift according to NLP.

It is pointed out in paragraph 3.31 that:

“Based on the cost of housing indicators (house prices, rental values and lower quartile affordability measures), as summarised below in Table 3.2, the market signals pressures in West Surrey are well in excess of those identified in Eastleigh and Canterbury in different respects”.

The report suggests that affordable housing needs equate to an annual housing requirement of 3,106 dwellings per annum to meet affordable housing need in full across the HMA. Whilst it is recognised that delivery of that quantum of housing is unrealistic, the SHMA fails to provide any uplift at all for affordable housing (paragraph 3.39). This is considered to be an incorrect approach. Particularly given that the SHMA is silent upon how the affordability gap might otherwise be narrowed.

Paragraph 4.20 makes mention of the fact that:

“..Paragraph 47 of the NPPF requires that full OAN for market and affordable housing should be met in the HMA, as far as consistent with the policies set out in the Framework. As it stands Guildford are not complying with this requirement because it has not been evidenced that the unmet needs of Woking will be met entirely in Waverley as a result of Guildford taking on none of Woking’s unmet housing needs. Paragraph 14 of the NPPF requires that Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”. It is not clear from the Guildford SA that this tilted balancing exercise has been undertaken. There is insufficient evidence to show that Guildford meeting even some of Woking’s unmet housing needs would be so significantly and demonstrably outweighed by the negative impacts of doing so. Indeed, the SA itself falls short of concluding that Guildford could fundamentally do no more than its own OAN. It sets out (para 8.2.2 sub-bullet (viii)) its own conclusion that “It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context. This is the finding of the SA work...”; being far from clear cannot be equated to ‘significantly and demonstrably’ outweighing benefits”

In paragraph 5.2 the NLP report concludes that the SHMA significantly underestimates the true scale of housing need in West Surrey and an OAN in excess of 1,729 dpa across the HMA is justified.

Other Considerations

There are a number of constraints which the Council took on board with regard when it sought to determine its ability to accommodate the OAN. This includes:

• The Thames Basins Heaths Special Protection Area (SPA) which covers the northern parts of our borough,
• The Surrey Hills Area of Outstanding Natural Beauty (AONB) which covers the southern half of the borough,
• The Metropolitan Green Belt which covers 89 per cent of the borough,
• Flood risk across the borough, and which is high within areas of the town centre,
• Infrastructure capacity where appropriate mitigation is not possible.

Reference is made in paragraph 4.19 of the Housing Delivery Topic Paper to the fact that the southern half of the borough is designated as part of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and that the NPPF affords this land the highest status of protection (paragraph 115).

There is a current commitment by Natural England to undertake an AONB boundary review. A study has been undertaken by landscape consultants Hankinson Duckett Associates, through Surrey County Council, reviewing the Surrey Landscape Character Assessment and looking for candidate areas within the AGLV that contribute to natural beauty. The study identifies a number of recommended additional areas of Surrey Hills AONB and one secondary potential additional Area of Surrey Hills AONB within Guildford borough. However, a review of the AONB will need to consider both areas for inclusion and deletion in order to be considered robust.

In paragraph 4.21 of the Housing Delivery Topic Paper the Council refers to the fact that it has:

“…sought to strengthen the level of protection afforded to the AONB within the Proposed Submission Local Plan. In accordance with the NPPF, we are not proposing any major development unless there is a strong and over-riding justification for doing so. As a result of this, the plan no longer proposes to allocate a site for 100 homes on the edge of Farncombe, at New Pond Road which is located in the AONB”.

Paragraphs 115 and 116 of the NPPF are particularly relevant in terms of the AONB

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads” (paragraph 115).

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated” (paragraph 116).

Evidently at the previous stage of the Draft Local Plan the Council considered that the proposed allocation of our client’s site in an Area of Outstanding Natural Beauty (AONB) was justified due to the overriding need to meet the overall housing requirement, and due to the fact that development of the site was not deemed harmful to the overall protection of the Surrey Hills AONB. This position is reinforced by the work conducted by Barton Willmore on behalf of Countryside Properties and included in the site specific representation.

The Council has dropped the proposed allocation in the Pre Submission Local Plan on the basis that it is able to deliver its overall housing requirement without the need to utilise any AONB land. However, as we have indicated above, we do not believe this to be the case as we consider the actual housing requirement figure to be significantly higher than specified in the OAN.

It is the case that the Thames Basin Heath SPA covers a large area across the northern part of the Borough, and the Surrey Hills AONB stretches across its southern parts. It is clearly appropriate for these to be afforded great protection. However, in relation to the latter, reference should be made to the forthcoming AONB Boundaries Review to be undertaken by Natural England. This will need to consider not only what other sites might merit AONB status, but also which sites might no longer warrant such status. This will ensure that it is the most valuable landscape that is afforded the strongest protection.
Urban Capacity Proposals

Guildford town centre is identified in paragraph 4.37 of the HDTP as being likely to be a source of housing supply that will deliver 1,172 dwellings to 2033, with a further 1,570 dwellings being delivered over the wider Guildford urban area (paragraph 4.41).

Guildford’s housing delivery rate has been poor in recent years. Over the recent 7 year period between 2008/9 and 2014/15, housing completions only averaged 202 dwellings per annum. Given this, it seems unrealistic to assume that sites in and around Guildford Town Centre will deliver substantial quantities of housing completions. Whilst it is entirely appropriate for the Council to seek to bolster residential accommodation in and around Guildford Town Centre, any allocations and assumptions concerning future housing land supply must be realistic and based upon likely market demand, rather than on aspirations alone. Furthermore, there are a number of technical and financial constraints, not least flood risk from the River Wey, but also ownership, access and viability (including CIL), which are also likely to impede early delivery.

The unanimous rejection in June 2016 by the Council’s Planning Committee of the £150 million Solum proposal to redevelop Guildford’s railway station and construct a new residential quarter of 445 apartments casts further doubt upon whether the delivery of significant amounts of new town centre housing provision is realistic.

We have submitted a separate representation in respect of proposed housing site allocation Policy A46 (land to the south of Normandy and north of Flexford). We note that the Council states in paragraph 4.130 that:

“…The site is deliverable and is able to deliver more homes in the earlier years than other individual strategic sites, and complete prior to those sites. The quantum of homes provided on this site is needed to contribute towards the OAN – the absence of this site would leave little overall flexibility. As set out above it is important that where sustainable to do so, we seek to boost significantly the supply of housing in the first five years. The delivery of this site is not dependent on A3 infrastructure timescales, and can start to deliver within the first five years following adoption of the Local Plan”.

We believe that there are other better sites, including land at New Pond Road, Farncombe (see our separate site based representation in Section 3) that are better able to contribute towards the OAN and 5 year housing land supply. We do not consider that the development of the Normandy site, which has been identified as being located in a red (high) sensitivity land parcel represents an appropriate strategic housing allocation site. It is apparent that the Council’s motivation for the allocation is that it will deliver a high quantum of housing on a single site, and that sustainability considerations have been put to one side.

Windfalls

The Land Availability Assessment (February 2016) seeks in Appendix D to justify the inclusion of 625 dwellings over the plan period as windfall. The windfall allowance being 50 homes per year in years 6-10 and 11-15, and 25 homes in years 1-5. However, the justification for this seems to be largely based upon the recent rate of prior approvals. We do not consider that this provides any sound justification for the proposed windfall allowance. Clearly, there has been a rush of applications to convert offices to residential accommodation in the recent past, but suitable sites are likely to dry up relatively quickly. Furthermore, garden land developments are likely to contribute less towards the windfall allowance than was the case in the past.

Housing Delivery

The following table in the HDTP (paragraph 4.169) shows that housing completion rates over the last decade have been low. It also demonstrates a record of under delivery of new homes against the OAN, leading to a significant backlog accruing over a short period of time.

<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/07</td>
<td>357</td>
</tr>
<tr>
<td>2007/08</td>
<td>478</td>
</tr>
</tbody>
</table>
The envisaged housing backlog at the point of adoption is 2019 dwellings (HDTP, paragraph 4.156). It is stated in the following paragraph that:

"4.157 Neighbouring authorities cannot meet this backlog, and it cannot be met in the first five years of the plan without significant harm to the Green Belt, and other harm (as considered in the Sustainability Appraisal, Option 5). It can however be met within the first 10 years from adoption, and this is considered the most sustainable approach to development within the borough, whilst not restricting development coming forward earlier, anticipating that accrued backlog will not be met until year 2027/28".

The Council argues in the HDTP that it would be unreasonable for it to deliver a 5 year housing supply that addresses the current housing backlog, and also provides a 20% buffer to the supply:

"4.171 To take this deficit, plus an additional year’s supply (693, 20% buffer) would require provision of 2712 homes. Add to this the five year requirement (693*5 = 3465) in this period, and this totals a required provision of 6177 homes over a five year period (1235 per year). This is not possible to achieve during this period (2018/19- 2022/2023) without significant harm to the Green Belt and other harm. This would require development of many high sensitivity Green Belt sites, which we do not consider a reasonable option. As set out, the SA has considered an option that seeks to maximise early delivery (option 5)."

Given the acknowledged fact that housing delivery will be weak in the early years of the Plan period, it will be important to bring forward smaller and medium sized sites such as the site at New Pond Road, Farncombe rather than being dependent upon much larger sites such as proposed housing allocation A46 at Normandy / Flexford, which will need to deliver major new infrastructure. This is demonstrated by the Table below which forms part of Policy S2. It shows that it will take until the late 2020’s before housing delivery rates rise significantly above the OAN target of 696 dpa.

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018/19</td>
<td>500</td>
</tr>
<tr>
<td>2019/20</td>
<td>550</td>
</tr>
<tr>
<td>2020/21</td>
<td>600</td>
</tr>
<tr>
<td>2021/22</td>
<td>600</td>
</tr>
<tr>
<td>2022/23</td>
<td>700</td>
</tr>
<tr>
<td>2023/24</td>
<td>700</td>
</tr>
<tr>
<td>2024/25</td>
<td>700</td>
</tr>
<tr>
<td>2025/26</td>
<td>700</td>
</tr>
</tbody>
</table>
Summary and Conclusions

The housing target proposed to meet Guildford’s housing needs based upon the OAN figure identified in the Strategic Housing Market Assessment (SHMA) is inadequate. The NLP report produced for our client has highlighted the following key deficiencies, which suggest that the OAN needs to be increased:

- In-migration from London indicates that more than 1,000 dwellings will be required in Guildford and up to 1,200 dwellings across the West Surrey HMA;
- At least a 20% uplift is required to the initial demographic requirement to take account of market signals;
- No uplift has been made to take account of the very high affordable housing requirement that has been identified; and

Consequently, we consider that ‘Table 1 – Planned delivery between 2018 and 2033’ is deficient in terms of the identified components of housing supply for the reasons set out above. Furthermore, it fails to ensure that the Local Plan delivers a 5 year housing land supply from the outset.

In the case of ‘Normandy and Flexford village expansion (Policy A46) which is identified in the table for 1,100 dwellings, we have submitted separate representations explaining why we consider this to be an unsustainable housing allocation. We have also submitted additional representations in respect of the following proposed housing allocations: A38, A41, A44 & A47.

The identified housing land supply is unlikely to be fully deliverable due to the substantive infrastructure requirements relating to a significant number of proposed housing allocation sites.

As a consequence of the necessity to bring about a step change in housing delivery rates, the Council will need to ensure that it makes provision for necessary Green Belt revisions and the allocation of sites, such as the land to the south of New Pond Road, Farncombe, which can deliver 90 dwellings as part of one of the Council’s preferred allocations in the Draft Local Plan (Regulation 18) in 2014.

Test of Soundness

In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with national policy, as it fails to ensure that a 5 year housing land supply is provided from the start of the Plan, it also fails to identify how the wider needs of the Housing Market Area (HMA) will be addressed, and finally its OAN fails to make provision for all relevant housing needs. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability.

Proposed Changes

The following amendments are proposed:

1. The Plan should identify a 5 year housing land supply from the outset, to which our client’s site at New Pond Road, Farncombe can make a contribution.
2. The Plan needs to specify how the wider unmet needs of the Housing Market Area are being addressed; and
3. The OAN needs to be increased to take account of in-migration from London, market signals and the affordable
housing demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [071816 Cover Letter.pdf (41 KB)
S4 App 4.2 SA Comparison Table.pdf (363 KB)
S4 App 4.1 Pt 4.pdf (1.6 MB)
S3 App 3.3 Pt 3.pdf (7.2 MB)
S3 App 3.3 pt 4.pdf (1.6 MB)
S4 App 4.1 Pt 1.pdf (320 KB)
S3 App 3.2 Pt2.pdf (9.4 MB)
S3 App 3.3 Pt 1.pdf (320 KB)
S3- App 3.9 Farncombe-Sustainability-Appraisal- Final JP.pdf (1.3 MB)
S4 App 4.1 Pt 3.pdf (7.2 MB)
S4 App 4.1 Pt 2.pdf (9.3 MB)
S3 -App 3.4 - Archaeological DBA, Sept14.pdf (5.9 MB)
S4 App 4.1 Pt 5.pdf (58 KB)
S3 -App 3.7- Phase I Habitat Survey.pdf (1.8 MB)
S3 - App 3.1 Promotional Brochure.pdf (1.8 MB)
S3 - App 3.2 Pt 1.pdf (97 KB)
S3 -App 3.5 - Heritage Statement.pdf (4.3 MB)
S3 App 3.3 Pt 2.pdf (9.3 MB)

Comment ID: PSLPP16/17291  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)
Agent: JB Planning Associates (John Boyd)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [S4 App 4.3 Pt 1.pdf (320 KB)
S4 App 4.3 Pt 2.pdf (9.3 MB)
S4 App 4.7 Pt 2.pdf (9.3 MB)
S4 App 4.3 Pt 5.pdf (58 KB)
S4 - App 4.6 SA Comparison Table.pdf (363 KB)
S4 App 4.3 Pt 3.pdf (7.2 MB)
S4 - App 4.8 SA Comparison Table.pdf (363 KB)
S4 App 4.5 Pt 4.pdf (1.6 MB)
S4 App 4.5 Pt 1.pdf (320 KB)
S4 App 4.7 Pt 5.pdf (58 KB)
S4 App 4.5 Pt 5.pdf (58 KB)
S4 App 4.7 Pt 4.pdf (1.6 MB)
S4 - App 4.4 SA Comparison Table.pdf (363 KB)
In response to the latest draft local plan I comment as follows:-

I object to the latest draft of the local plan which I believe is not fit for purpose.

I object to the lack of transparency in the calculation of the housing numbers. A "secret" formula prepared by property professionals whose interest is in a increasing housing market is not to be relied on without proper scrutiny. This is particularly relevant in the context of the country leaving the EU and changing demand.

I object to the Plan being developed around offers from developers rather than a structured view of how the borough should develop.

I object to GBC's lack of commitment to recognise that that Guildford's location in the green belt presents the need for significant constraints to their policies to limit growth policies and housing numbers to protect the green belt. Housing need is not considered as "special circumstances" to utilise the green belt.

I object to the focus on growth assumptions that focus on regional growth rather than local need.

I object to the proportion of housing proposed in the green belt. By planning just for local need, utilising green belt constraints, using land proposed for retail and industrial uses (where there is no proven demand) it should be possible to present a plan based on the premise that all local housing can be accommodated without using the greenbelt.

I object to the large scale developments proposed and in particular at Wisley, Burpham and Hogs Back. These proposals cut through the green belt along the A3 corridor, and Wisley in particular is just unsustainable.

Having said that if all other options for saving greenbelt land are exhausted then an urban expansion of Guildford's boundaries seems the more logical and sustainable way forward. Whilst I believe the scale of developments along the A3 are inappropriate and far to large I don't understand why Lord Onslow's proposal at Merrow is not included, at least in part. I suspect big business is sponsoring the other sites and has influenced the Council. If all efforts to avoid green belt development had been exhausted and there remained a local need then a small proportion of the Burpham development and a small proportion of Lord Onslow's Merrow proposal would at least have a chance of being sustainable and could provide an appropriate mix of smaller unit size housing.

I do not believe the Council's promise that development will be limited if the relevant infrastructure is not provided. The current infrastructure can't cope with existing need and there are no firm or deliverable plans to add extra capacity. The National Highways schemes are already well back in the plan and there can be no certainty that the funding will ever arrive for whatever the improvement proposals are.
On a more local level I object you the late introduction of Garlic Arch based on infrastructure "bribes" whereby junctions to the A3 trunk road are offered in exchange for designating green belt land for housing. There are no studies to show the impact on the local road network and no commitment by the highway agencies to support the proposal. Garlic Arch which is agricultural greenbelt land and has ancient woodland, flooding and environmental pollution issues given its proximity to the A3 is not appropriate as a housing site. The site sits between two parishes but it will have the impact of doubling the size of Send Marsh and Burnt Common and changing the rural nature of the villages for ever.

The more logical option of utilising the Burnt Common site, proposed in the last local plan, has been removed. Although the scale and uses that had previously been proposed were inappropriate the Burnt Common site could be considered as having some areas of brown field and therefore makes a far more logical option. Garlic's Arch site should be removed from the plan.

I object to the proposal for a four way junction to the A3 without impact studies on Send and surrounding areas. However safeguarding the land makes sense but this does not mean we have to sacrifice large areas for green belt to "pay" for it. Garlic's Arch is an inappropriate site and GBC should look at their own planning refusal on a part of the site only two years ago for the reasons.

I object to the proposal to remove green belt from the western end of the borough, particularly along the A3, whilst adding it at the eastern end (Councillor Spooner's Parish).

I object to the blanket removal of villages from the green belt. The protection afforded currently does not mean that appropriate infill development can occur but it does allow respect for the fact that the surrounding areas are greenbelt. The removal of greenbelt status from villages will over time change the character of villages to wholly urban environments. Further open spaces within villages need protection, e.g. Send Marsh Green, which currently is protected by greenbelt status.

I believe that behind this draft of the local plan there is a political objective of driving growth at the expense of the green belt. GBC are not supporting the majority view of residents by fighting to protect the green belt but rather responding to national political incentives and developers interests.

Whilst perhaps this version of the local plan might be considered a minor improvement on the last one, once again the Council has failed to put a convincing draft local plan together at considerable expense to the rate payer. GBC need to listen to the people who live in the borough and reissue the draft local plan indicating they are prepared to fight for the borough not responding to regional or national blanket policies.

Although the cost of producing these unacceptable plans is no doubt vast, please try again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. B) The sites at Wisley Airfield, Garlic Arch and Burpham would each result in vast increases in population numbers which would result in unbearable strains on local services. Rush hour trains are grossly overcrowded and the roads, particularly around Guildford are usually at a standstill during the mornings and evenings and the Royal Surrey Hospital has almost reached full capacity. Many local schools would be totally unable to accept extra pupils with each needing sizeable extension work.

1. C) Much of this land is currently arable and if lost would result in the need for yet more food imports - hardly desirable in view of increased import costs resulting from the country’s EU departure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1173  Respondent: 8601761 / Albury Parish Council (Roy Hogben)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I Object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6362  Respondent: 8601793 / Roy Proctor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in response to your invitation to comment on the Guildford Borough Proposed Submission Local Plan.

I believe that the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA have been inflated either in error, or in pursuit of the aims of GBC to expand the borough in an aggressive manner. The requirements of the National Planning Policy do not result in the need to use a population forecast which is in excess of those issued for Guildford by the Office of National Statistics. I realise that the Evidence Base documents are not the subject of this consultation. However, since Policy S2 is based on forecast population numbers which are unsound, I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11175  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I am writing in response to your invitation to comment on the Guildford Borough Proposed Submission Local Plan.

I believe that the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA have been inflated either in error, or in pursuit of the aims of GBC to expand the borough in an aggressive manner. The requirements of the National Planning Policy do not result in the need to use a population forecast which is in excess of those issued for Guildford by the Office of National Statistics. I realise that the Evidence Base documents are not the subject of this consultation. However, since Policy S2 is based on forecast population numbers which are unsound, I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the 2016 version of the GBC Draft Local Plan as, even though we are told the 2014 version has been redrafted after 'listening to the people', I cannot see evidence of this. I also object to the PR film at the online form link, claiming to 'represent the people' as it does not. It represents the University of Surrey, the Royal Surrey Hospital and the GBC Executive and has no representation at all for the rural areas of the Borough, therefore is a biased PR exercise. (I wish the above to be recorded as objections).

I also wish it to be noted that the objections below are not to be taken solely as site location objections if sites are mentioned, but general objections to the draft Local Plan.

Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly. I object to these figures as they were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body. Who are all these homes for? Not local people but a nett SE England 'migration’. There is no generic evidence to back this up but we are told ‘GBC has faith in it’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5163  Respondent: 8606561 / S A Giddings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Once again I am writing to complain about your thoughtless Local Plan, how can you be so irresponsible, you have not thought it through, just like the EU.

Horsley and Ockham currently have thousands of visitors every week coming here to enjoy our countryside in the Green Belt, we have local hotels, conference centres, a caravan and camping site, not to mention the millions of cyclists who visit our country lanes every year. We do not have room for all of them as well as a huge percentage of Surreys new houses and the SANGS Site will not help, with access via Green Lane it will make things worse.

Why do I need 2600 new houses all within a one mile radius of my house and with no new facilities for medical, schools, etc. The sewage in Green Lane already overflows on a regular basis. Parking in East Horsley is impossible on Wednesday and Saturday mornings.

The area is an AONB with so many historic buildings, Wisley and National Trust properties.

WHAT ARE YOU THINKING ...... HAVE YOU EVER BEEN TO OCKHAM?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16959  Respondent: 8606977 / Mrs Sarah Tipping  Agent:
I object to the failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

--

Policy S.2 Borough Wide Strategy

It is difficult for anyone to predict at this stage what the impact of the Brexit decision will be. What we do know is that most of Guildford should be highly protected from development thanks to long established planning policies such as the Green Belt which are defined and understood by the general public as permanent. It appears that this is not the intention in the draft Local Plan. 44% of the nationally important countryside within the Surrey Hills AONB lies within the Green Belt and about 75% of the area of the borough is further protected by the Thames Basin Heath SPA. Other land such as Registered Commons and Ancient Woodland are also not available for development.

CPRE objects to a draft local plan which calls for an increase in the number of residential dwellings by a quarter. This requirement for a housing figure of 13,860 dwellings is based on the West Surrey Strategic Housing Market Assessment (SHMA) prepared by GL Hearn for GBC which is shown to be flawed. Green Balance has prepared for CPRE a review of this document for Guildford, Waverley and Woking Districts which maintains that the annual housing figure upon which the Borough Wide Strategy is based for Guildford is far too high. This renders the whole Local Plan for the District unsound.

GBC has not been able to prepare in time an acceptable plan for the Town Centre and the urban area of Guildford, causing undue emphasis to be switched to building on Green Belt countryside around the town. It is in our view unreasonable to embark on a radical transformation of the borough on the basis of an uncertain housing target which may well prove increasingly unreliable. CPRE OBJECTION.

It is in our view essential to reconsider the proposals made regarding the priority given to retail and office development, which we believe to be overstated, rather than to housing at an appropriate density on brownfield sites in the town. We question the allowance for the provision of other business employment land such as warehousing. It seems to us that
retailing is undergoing a transformation illustrated by the loss of Austin Reid and BHS, the incursion of Aldi, M&S foodshops at rail and petrol stations, and on line purchasing and delivery of all kinds.

We maintain that the gap town of Guildford is a “special case” and should be recognised as such from a planning viewpoint because of its widely protected countryside which should be an ongoing constraint on development and preclude major structural change along the lines proposed. We feel obliged to emphasise again the permanence of the Green Belt, the Surrey Hills AONB and the SPA in this district. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1977  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

CPRE objects to the amended policy S2. It is disappointing that the OAN selected is still so high and that no constraints have been applied as required under the NPPF and NPPG. This contrasts with the Woking Core Strategy which has selected a constraint of no less than 50%. It appears that the draft local plan for Guildford has deliberately chosen to ignore the huge opposition of the public to loss of the Green Belt and of other open countryside to housing development. The Council has not given sufficient priority either to the potential for housing and flat development on brownfield sites in the urban part of Guildford, and has not insisted that the University of Surrey honours its commitments to build much more student accommodation on their campuses. CPRE agrees that it is more realistic to follow a phased approach towards development as plan fulfillment will have to depend on infrastructure provision. It is unrealistic to talk about the need to meet rapid change as required by the NPPF since planning ahead is virtually impossible when so many of the requirements for development to be successful depend on elements over which the Council has little or no control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3514  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

CPRE remains as concerned as ever about the background to this Guildford Borough consultation which is overshadowed by the EU referendum decision and the recent national election with its as yet unsettled political and economic outcome. It is of course impossible to predict the likely impact of the BREXIT negotiations on a wide range of issues including migration, agriculture, climate change, and other policies regarding economic, environmental and social matters. The fact that the whole of the South East is however subject to water stress remains a constant background to decision-making.
It is very difficult to draw up a local plan when so many decisions depend on independent bodies such as Natural England, Highways England, Thames Water, and the Environment Agency. One also has to add to this list other uncertainties relating to Network Rail, the franchise companies which operate within the Guildford area, and the as yet unresolved future development of both Gatwick and Heathrow airports.

All will be influenced by government budgeting, interest rates, and other factors outside local council control. We also have to take into account the involvement of a new Housing and Planning Minister in this sector. The involvement of Surrey County Council adds a further dimension.

CPRE has already made clear that the ‘Objectively Assessed Need’ (OAN) figure proposed for housing in the draft 2016 version of the GB Local Plan was in our view far too high and was based on inaccurate data that needed further analysis and review involving up to date statistics. The revised proposal now made in the draft 2017 document remains in our view unacceptable. In addition to the work already submitted by Green Balance for CPRE Surrey, CPRE wishes to draw attention to the further analysis by Neil McDonald issued in April 2017 regarding “Waverley Borough Council in response to Inspector’s Questions”, and to the “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA” in June 2017 which confirm our views.

CPRE feels obliged to repeat our earlier request that a more careful consideration is made of the many widespread and serious constraints on development within the Borough, and the need to observe Green Belt policy which requires that the countryside around the town of Guildford and its villages is protected and enhanced rather than undermined by inappropriate urban extensions, large housing sites and widespread “inserting” in Green Belt villages.

CPRE has also to add to this objection the way in which a number of new proposals relating to Garlick’s Arch, Burnt Common and Godsen Hill have appeared for late consideration, which have not been reviewed previously at the regulation 18 stage. We are particularly concerned about the harm which will be done to the Green Belt by ribbon development along the A3 and the associated impact to traffic in Burpham, Merrow, West Clandon, the Horsleys, Send and Ripley.

CPRE has concentrated its comments and objections in this latest consultation on the issues that most affect the countryside and the Wey Navigation, but feels obliged to point out that we have major reservations about the proposals made for the development of Guildford as a whole. We cannot agree that “rapid change” as required by NPPF, can be envisaged along the lines proposed without a breakdown in road infrastructure. This is especially true with regard to the A3, but also applies to the access routes to Guildford from Cranleigh/Dunsfold (A281/B2128), Farnham (A31), Godalming (A3100), Rushmoor/Aldershot (A323), and Woking (A320). It is apparent that a major issue is the limited funding resources available in this road development context from Highways England, Surrey County Council and Guildford Borough Council itself. There appears to be an over reliance on developers for funding that is influencing decision-making and leading to unsustainable “solutions” at for example Dunsfold, Wisley and elsewhere.

Plans for new railway stations near Guildford and the North Downs line to Gatwick remain largely aspirational at this stage. CPRE supports in principle the new station at Park Barn in proximity to the hospital for obvious reasons. However, the case for a station at Merrow is not so clear cut, especially as Clandon and London Road stations are comparatively nearby.

CPRE recognizes that there is a need for affordable housing in Guildford but believes that this shortfall could be largely overcome if the University of Surrey would give priority to the building on their campuses of the multiple occupancy accommodation for students they have promised. This would free up cheaper priced housing already located within the town and incidentally lead to an increase in tax income for the Council. It is apparent that housing development in Guildford Borough is directed towards supplying larger more expensive dwellings which give a higher return on investment than the provision of lower cost houses. CPRE maintains that priority should be given to the development of brownfield sites for housing which could include land now allocated for surface parking in some urban locations.

The CPRE London Green Belt Council (LGBC) have expressed their objection to the proposed development at Blackwell Farm by the University of Surrey on the grounds of the permanence of the Green Belt and that “exceptional circumstances” do not apply for an additional boundary revision to be made beyond that agreed for the Manor Farm campus in 2003. Their involvement indicates the concern of those who support the Metropolitan Green Belt which was created for the benefit of London inhabitants just as much as for those of Surrey and Guildford. The statement in the
Corporate Plan that Guildford is “on London’s doorstep” is hardly reassuring to those in CPRE who do not wish the environment of Guildford put under threat by an attempt to go for economic expansion rather than limit its ambitions to “smart growth” which does not endanger the countryside by the development of rural villages through Green Belt erosion. LGBG has also expressed concern about Green Belt intrusion at Gosden Hill and Three Farms Meadows at the former Wisley airfield site.

SUMMARY LIST OF MAJOR OBJECTIONS

- **Green Belt:**

CPRE is disappointed that the GBC draft local plan continues to insist on further Green Belt erosion. The recent decision made by the Secretary of State (S of S) in this context does not appear to have been taken into account. This decision relates to the dismissal of an appeal at Benfleet, Castle Point in Essex in a letter dated 21st April 2017 (APP/M1520/A/14/2216062). The decision involves a council that does not have a 5 year supply of deliverable housing sites. Whereas the Inspector’s view was that the appeal should be allowed under NPPG, the S of S ruled that it is national policy that personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt, and any other harm, so as to establish “very special circumstances” justifying a boundary review. He therefore disagreed with the Inspector’s view that this is NPPG “guidance” and as a result of his decision, a “policy” has now been established in this context which is directly relevant to Guildford.

- **Town Centre Capacity:**

CPRE has already made clear that it considers this draft Guildford Local Plan unsound because no complete proposal or Master Plan for the Town Centre, or for the development of the urban area, has been made available. This is still required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside should be considered in parallel in order for a sound plan to be established. CPRE maintains that not enough brownfield sites have been set aside in the town for housing accommodation. Issues relating to bus services within the town and to and from communities in the surrounding countryside remain largely unresolved.

- **Reviews of Objectively Assessed Need (OAN):**

It is CPRE’s view that the over estimation of housing need makes the draft Local Plan unsound. Green Balance has already submitted a critical review of the GLH Hearn West Surrey Strategic Housing Market Assessment for Guildford, Waverley and Woking. Now Neil McDonald has issued two further studies relating to Waverley (September 2016) and Guildford (April 2017) which question further the soundness of the draft plan submitted. CPRE believes that the focus of attention on building in the Green Belt countryside has been caused by too high an OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined in favour of office, business and retail growth rather than given the attention it deserves. In particular CPRE maintains that more emphasis should have been placed on the use of brownfield sites within the town for higher density housing and the University should supply more accommodation for students on its campuses.

CPRE is particularly concerned about the wide use and large areas of surface car parking in the town which appear to be a waste of valuable space where multi storey or underground parking should be more often considered. The hospital indicated at one stage that the use of multi storey parking was being planned by them but this still remains outstanding. Car parking at the University campuses and the Research Park could be better employed either for multi storey use or under buildings for student or office accommodation. The HQ for the WWF on Brewery Road in Woking is an example of what can be done successfully in the centre of a town and near the river if good architecture is employed. A range of valuable sites of this kind exist and should be investigated in consultation with the Wey Navigation as they are needed in this context. We are disappointed that the proposals for underground parking at Bright’s Hill have been scaled back. This sustainable location is within easy walking distance of the town centre and car parking could we believe be provided underground because of the chalk geology.

Other heritage towns in this country and particularly in the EU recognize the importance of providing underground parking for new development. Priority at Guildford is given to the under utilised Onslow Park & Ride at the University next to land where a commitment to restrict traffic was made which has not been kept. Surely, it is necessary to look
again at how we are using precious land space in the town for surface parking so that erosion of the Green Belt is cut back in our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8652  Respondent: 8608225 / Valerie Jenner  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

These developments will inevitably lead to a merging of all the areas which are at present separate entities, Wisley Airfield, Ripley including Garlick's Arch to Send and on to Clandon and Burpham. We wish to remain villages - we all live here because they are villages. The development is far too concentrated in this part of the borough and GBC has made it a feature of their plan with larger numbers than other Borough Councils in Surrey. I therefore object to the Borough Wide Strategy (Policy S2) and the SHMA figure of 693 houses per year as being too high (Appendix D).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1270  Respondent: 8608865 / WBDRA. (David Bird)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

WBDRA along with many other Residents Associations and Local Interest Groups in Guildford OBJECTS to the proposed SHMA figures.

We were present at the first public meeting where consultants G L Hearn announced their SHMA findings to a stunned and shocked audience. Their methodology and resultant housing numbers seemed to have been based on the flimsiest of evidence, totally ignoring the high population of transient students in the borough and failing to address known statistical predictions about population movements and the local Housing market.

The slightly modified SHMA figure now offered by GBC has been the subject of much debate and challenge since its publication and GBC have steadfastly refused to publish the bases of calculation for their figure of 690+ homes to be built per annum

No constraints appear to have been applied such as Flood Plain, Green Belt infrastructure limitations etc etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
OBJECTIONS TO 2016 GUILDFORD DRAFT LOCAL PLAN

West Clandon Parish Council welcomes the opportunity to comment on the consultation draft Guildford Local Plan. We have a number of objections to the draft plan.

In particular we consider the consultation process to be flawed. We note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation process. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

General comments

We have serious, general objections to the plan which are summarized below as well as being expanded upon in our comments on numbered policies in the draft plan.

- In common with many others we do not believe the housing figure has been properly calculated and we believe it overstates housing need. The Council has prevented Councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
- The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- We do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.
- Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
- Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.
- The A247 through Clandon is overburdened by traffic already and is unsuitable as an A road in any event. In parts it is too narrow for two lorries to pass and lorries routinely mount the pavement at speed in a dangerous fashion. We believe the plan should include proposals to provide other routes for traffic to take traffic away from the A247.
• We object to the Gosden Hill prop. We do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt. Even if the Gosden Hill development were to remain in the plan we believe the boundary should be explicitly drawn so as to prevent it being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.
• We object to the Garlick’s Arch proposal. This site was removed from consideration before the previous draft of the plan was issued. We do not understand how this site has been brought back into the plan. We do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. The site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

General Comment on Policies

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2383  **Respondent:** 8609217 / West Clandon Parish Council (John Stone)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**POLICY S2 – Borough Wide Strategy**

We object to Policy S2 on a number of grounds.

1. The housing number of 13,860 new homes is excessive. The number is based on pre-Brexit data for economic and population growth, including migration. These need to be revised downwards, possibly quite seriously.

1. The number is in any event based on an arbitrary and inappropriate Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate and Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. These concerns have been raised repeatedly since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinize it. The absence of a ready alternative, however, does not make “West Surrey” as a Housing market Area reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

1. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs numb. The figure of 13,860 new homes is completely unsubstantiated. It
has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. We have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

1. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,8 So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

1. This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from
encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

1. The Plan is out of balance in proposing 36% of all new housing in the three wards of Lovelace, Send and Clandon and Horsley. These are currently rural areas whose identities will be greatly and detrimentally changed by these proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9084</th>
<th>Respondent: 8609377 / Mr Andy White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The housing figure produced by the SMHA is unsound as no constraints have been introduced by GBC unlike Woking and Waverley. There is no rational why the duty to cooperate has not extended to the east and west of the Borough. There is no explanation as to how the numbers of houses will be delivered when for the last 15 years GBC has been unable to deliver half of this figure. A revised SMHA should be undertaken in the light if Brexit.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The SHMA produced by the GRA is more deliverable and deals with other factors more appropriately.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan is unsound as the plan does no deliver the infrastructure needed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12574</th>
<th>Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I have lived in East Clandon for 13 years. As such, I have a strong view about the proposed Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
consultation with us and this combined with estimated demand from London residents will turn Guildford into a
dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners
to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct
contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley
and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances
required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2472  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. Updated June 2017, as attached. In accordance with para 166 of the NPPF the appropriate constraints MUST be applied by the Borough Council. In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than objectively assessed housing need figure contained in the draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Review of GL Hearn's Guildford Addendum to the West Surrey SHMA Final SV.pdf (1.2 MB)

Comment ID: PSLPP16/10067  Respondent: 8640353 / Julian Cranwell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have
effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to **510 homes per annum.** The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:  

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.  

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to **481** because: 1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford. 2. there should be no increase for affordability above basic demographic change. 3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market. 4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately **500 homes per annum** would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. A further study is attached which is included within this section by reference. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. WE have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in **exceptional circumstances**, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the
harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate
development on a site within the Green Belt. Appendix: Report prepared by David Reeve in relation to the SHMA
(attached as this is a separate document but included within this section by reference). THE NEED TO APPLY
CONSTRAINTSMinisterial guidance in relation to building on the Green Belt is clear: 1. “the single issue of
unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special
circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th
February 2014. 2. “we were always very clear that we would maintain key protections for the countryside, and, in
particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in
exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael
Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet
housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying
inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014. 70% of the sites
put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The
National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green
Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.
Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on
land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical
requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is
overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to
apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact
that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major
infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.
This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which
over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas
of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve
the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of
housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/
2015. (Monitoring Report by GBC 2015) Whilst we have many significant objections to the GBC Local Plan we applaud
the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed
land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We
believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to
protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12551  Respondent: 8640801 / Sue Howson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally
Compliant? ( )

Just a short note to say that I support the Guildford Residents Association (GRA) response and oppose Guildford
expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9587  Respondent: 8643393 / Sue Baker  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I accept that provision must be made for new housing, in particular for young people and others who need an affordable housing solution. But I don’t think the Draft Local Plan is the answer. The majority of the proposed new housing (65%) is slated for Green Belt land. I find this totally unacceptable and I do not believe that GBC has properly and fully investigated the available brown field and other sites for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/9591  Respondent:  8643393 / Sue Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I object to the undemocratic process that has produced this plan. We have just had a referendum on this country’s membership of the European Union. Whether one is in favour of leaving or remaining, it was right to give the electorate a direct say in such a momentous decision.

Yet a decision of this magnitude, which has far-reaching implications on local life, should not be in the hands of a few elected officials.

So GBC, do the right thing. Accept that a majority of the electorate are against it. Hold a poll to confirm that this is the case. Accept that the plan is flawed and think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5226  Respondent:  8655233 / Kay Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the fact that there are many brownfield sites in Surrey and Greater London that could be used to build homes and these should be used first and foremost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/5233  Respondent:  8655233 / Kay Mackay  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous since 2014. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/10  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** (No)

**is Sound?** (No)

**is Legally Compliant?** (No)
Guildford Borough Council have a duty to the residents to protect the environment, to protect green belt land, to protect residents and their families. This fails in every area. There is no case for taking villages such as Send, Ripley, Burnt Common and part of West Clandon out of the Green Belt. There is no case to extend the University if it impacts on residents in the area. The roads in this area are over flowing with traffic and at times is almost at a standstill. To protect put in policies that mean people can not enjoy the Countryside, can not sit in their gardens because of noise pollution is not compliance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Scrap the proposed building on Green Belt and use the brownfield sites. Stop expanding the University at the cost of residents.

Attached documents:

---

Comment ID: PSLPP16/1663  Respondent: 8659489 / Helen Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The housing target is a complete invention, with no evidence demonstrated of the need for it in such numbers. All additional housing should be associated with urban areas i.e. Guildford. Any additions to the villages should be very restrained and small in number and size. The number should be restricted to the local plans put forward by individual villages and parishes. The proposal of a new town on Wisley airfield should be dismissed, as it has been already by GBC planning, as completely unacceptable in all regards - for the many reasons put forward in the objections by GBC landing themselves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/223  Respondent: 8667425 / Onslow Village Residents Association (Anthony Jacques)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to add my voice to the increasing number who feel the Local Plan needs extensive further amendment.

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our already heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY S2 Borough Wide Strategy

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial subcontractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID | PSLPP16/2302 | Respondent: 8671969 / Valerie Thompson | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

Finally, I strongly feel the process has been described to residents in a purposefully and unnecessarily complex manner which has disenfranchised much of the population from fair comment. Whilst there is the need to make reference to and speak in a legal context, it is a barrier to many and produces a failing on behalf of the council to its citizens to effectively communicate and act in a democratic manner.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

| Comment ID | PSLPP16/6220 | Respondent: 8672161 / Simon Page | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

S2 I object to the number of new homes proposed

13860 is well beyond the actual "need" in the Borough. There may be a "demand" for more houses, (many people would love to live in the so-far, "leafy," will-be “concreted-over” Surrey,) but this is an excessive number, reached by GBC sub-contracting to a company who sub-contracted again, thereby being able to claim that the results of their surveys were their own "intellectual property" and therefore not available to either the Councillors or the general public ( even after requests under the FOI Act).

That the Scrutiny Committee of the GBC did not discuss or even have access to these documents is appalling. It is immoral, if not illegal to withhold this information, because, without it, no one can know why the number of houses is so large. What is more, the companies employed are connected to the construction industry and therefore are likely to benefit from development around Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

| Comment ID | PSLPP16/2302 | Respondent: 8671969 / Valerie Thompson | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

* Expansion should be constrained to protect the character of town and country in our congested gap town;  
* It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth;  
* Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion;  
* Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses;  

---
**POLICY S2: Borough Wide Strategy – I object**

The housing requirements proposed under policy S2 flow from the flawed Strategic Housing Market Assessment produced by the remote consultants GL Hearn, now a subsidiary of Capita Real Estate, whose main business is concerned with property development. Contracting out the estimation of housing requirements to property developers is akin to asking foxes to design chicken coops; it ensures that the results are highly compromised because of conflict of interest. The SHMA is consequently flawed, principally because a) it over-estimates future migration trends; and b) its assessment of housing requirements is subjectively inflated over even such high demographics, without proper disclosure of methodology.

In addition, this policy has totally ignored the following key requirements from paragraph 17 of the NPPF:

- “take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them”
- “recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it”
- “contribute to conserving and enhancing the natural environment and reducing pollution“
- “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value”
- “conserve heritage assets in a manner appropriate to their significance“
- “actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable“.

Removing West Horsley and other rural villages from the Green Belt by ‘insetting’ them, and expanding the boundaries of the settlement areas into neighbouring green fields (i.e. reducing the Green Belt) does NOT protect the Green Belt. Nor does it give adequate recognition to the intrinsic character and beauty of the countryside.

Nor, by giving developers the option of building more cheaply on green fields does it encourage the effective use of land by reusing land that has been previously developed (brownfield land). By turning West Horsley into a rural town, it does not conserve the heritage assets of West Horsley. By encouraging 35% more houses in a rural village without intrinsic employment, rather than brownfield urban sites, it does not make fullest possible use of public transport, walking and cycling within the Borough.

But the cardinal disregard of the NPPF paragraph 17 is in terms of its requirement:

“empowering local people to shape their surroundings”

It is obvious from the degree of protest that there has been throughout Guildford Borough to the previous (2014) Draft Local Plan and the preceding ‘Issues and Options’ ‘consultation’ that local people wish to shape their surroundings in ways that are entirely different from that which is projected by the Draft Local Plan. As strong evidence of the lack of empowerment, West Horsley Parish has already twice recently provided democratically robust opinion on the way they

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15162</th>
<th>Respondent: 8672993 / Kes Heffer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Page 109 of 1722
wish to shape their surroundings and that shaping involves minimal development. The West Horsley Parish Plan1 of 2008/9, compiled under the auspices of the West Horsley Parish Council and collating the opinions of those households responding to a questionnaire (430, or 38% of all in the parish), begins its section on the ‘Environment’: ‘This section achieved the most clear-cut answer of all. All but one respondent values the rural character of the village.’ Furthermore, under ‘Housing and Planning’, the results of the questionnaire showed that: ‘A large majority (337) of respondents believe that West Horsley should not be one of the village settlements identified for meeting new housing requirements’. With the background that nine sites in West Horsley had been suggested in the GDF process for possible development, ‘over half of respondents (180) consider that no area, either inside or outside the current settlement area, is appropriate for development of the village’. ‘Of the respondents who answered more than zero area as appropriate for development most believed that any development should have an emphasis on affordable and sheltered housing and be distributed over more than one site. There was little support for any development of commercial facilities’. ‘Confirming the majority opinion for zero area of development, almost exactly half of respondents (128) considered that West Horsley can currently accommodate no additional dwellings.’

The 2015 Emerging Neighbourhood Plan of West Horsley2 essentially confirmed these majority sentiments. Again evidenced by a comprehensive survey of residents for the Neighbourhood Plan itself, together with the results of research by West Horsley Parish Council and Surrey County Council, Policy 2 of the emerging Neighbourhood Plan is: “The emerging Neighbourhood Plan provisionally provides for the development of between 40 and 75 new homes within the area covered by West Horsley Parish Council, between 2016 and 2031”. This is consistent with Policy 1 which states: “We will ensure that the village maintains its rural and open style, architectural heritage and special atmosphere and character and we will resist the urbanisation of the village. Specifically we will protect, conserve and, where appropriate, improve: ? The designated Green Belt status ? Open spaces, parkland, green space, trees and hedges ? The open aspect and strategic natural spaces along East Lane, The Street, Ripley Lane, the A246 (Epsom Road), Long Reach and Ockham Road North, which reinforce the village’s rural nature”. In addition: “When asked about where new housing development should take place, only 3.4% suggested that the designated Green Belt should be considered.”

In stark contrast, the GBC Draft Local Plan entails the addition of 385 extra homes within West Horsley, an increase of approximately 35%; and the addition of 533 homes within East and West Horsley parishes together, most of it outside the current Settlement Area, and therefore in the current Green Belt. Over the whole of Guildford Borough the new plan proposes some 13,860 houses, of which almost two-thirds are on current Green Belt. The imbalance makes a mockery of the supposed Policy P2 (“Green Belt”) which states ‘We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development’. It is illuminating to contrast this revised statement with that in the previous policy #10 of the 2014 draft Local Plan; this stated: ‘We will continue to protect the Metropolitan Green Belt against inappropriate development in accordance with national planning policy to maintain its openness and open character’. A better paraphrase of the current version would be: GBC proposes to make use of the openness of the Green Belt for easier development now; in the future it may protect what is left of the Green Belt. This is despite the massive objections to the degree of Green Belt development proposed in 2014. For West Horsley the proposed development is entirely against the opinions expressed within the Parish Plan. The NPPF requirement to empower local people to shape their surroundings has been paid merely lip service by GBC. Although the old South East Plan3 has purportedly been abolished, a conceited crow of the Conservative Borough councillors in their manifesto when seeking election just a short time ago, it is apparent that the SE Plan’s designation of Guildford as a ‘centre for significant change’ still dominates the approaches of GBC. This blinkered, autocratic, patronic approach completely ignores the wishes of the local population. There appears to be a pride amongst GBC and many Borough Councillors that ignoring democratically-expressed wishes is somehow ‘strong governance’, and that this virility is laudable. Although it has issued manifold purported ‘consultation’ documents and ‘topic papers’ with colourful balloons all over their covers, GBC has patently ignored most of the critical comments that have been returned by residents: the council has taken not a jot of notice of popular petitions. That is not proper empowerment of local people. This is not ‘meaningful engagement and collaboration with neighbourhoods, local organisations’ (NPPF 155); it has been collaboration with solely growth-minded businesses. How can key requirements of the NPPF be ignored in such a blatant fashion?

Pertinent here are the words from the Ministerial Foreword to the NPPF which encourages local participation in planning: ‘This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this. In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities’.
If these words are to have any meaning in this context then local views on the benefits of local immigration should be taken into account in producing the SHMA and housing target. The specialists in Capita Real Estate themselves pronounce that their estimates of future housing ‘need’ are objective: they seem to be unaware that their approach is based on a particular viewpoint of how economic growth occurs, or how the balance between economic growth and other factors should be weighted. The predominance of Capita Real Estate in churning out these assessments, being the apparent market-leaders selected by Local Planning Authorities amongst contractors, is a dangerous concentration of national planning power in what is essentially a biased company with no interest in protecting the countryside, Green Belt or other. It is perhaps no coincidence, but also no consolation, that the scale of attack on the Green Belt envisaged in this draft Local Plan for Guildford Borough is not unique within the nation: the Campaign to Protect Rural England estimates that over 219,000 houses are now proposed to be built on Green Belt land across England. The original, inspired, far-sighted purposes of Green Belt, that has been, and is, valued by so many of past and present generations is rapidly being destroyed; if this trend continues future generations will not be able to value Green Belt because it will have disappeared, and their lives will be the worse for that. As with choice of Pegasus Group to perform the ‘Green Belt and Countryside Study’, another flawed document in the Guildford Borough ‘evidence’ base, every commercial, or ‘professional’, incentive, of Capita Real Estate is to promote development, as is easily ascertained from their website. People in communities can assess the migration trends that they want for their localities: these would be as objective, and no more subjective, than the development-biased view of Capita Real Estate specialists.

The increase in the number of homes (by past correlation almost exactly equivalent to increase in population) proposed for Guildford Borough in the draft Local Plan represents an increase of about 25% over the 17 years of its duration. This is equivalent to a compounding annual increase in homes of 1.32%. For those with short-sighted ambitions that may not sound much, but if such a rate of increase were to be maintained over future generations (a perspective that the NPPF insists upon when considering sustainability) then a simple calculation indicates that the Borough population would increase by nearly 40% in one generation (25 years) and almost double in 2 generations (50 years). It would increase by an order of magnitude (i.e. a factor of 10) in only 7 generations. Recall the definition of sustainable development: achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. There is no limit on the number of generations that is to be considered in this premise. Indeed, Councillor Paul Spooner professes in the Foreword to the draft Local Plan: “The borough of Guildford is a very special, beautiful place for all who live and work here. We want to keep it this way for generations to come.”, whilst endorsing development proposals that can only lead towards one outcome in less than a few generations at most: a dense urban sprawl interspersing just a few remnant open spaces. Before this draft plan can be submitted it is incumbent upon Guildford Borough Council to demonstrate, with hard evidence, just how the proposed Local Plan will ensure improvements to the lives of the majority of current residents, or indeed how a majority of future residents will have improved lives over those of current residents ‘for generations to come’. At face value the daily life of an average current resident will deteriorate as a direct result of the extra crowding that will ensue. If widespread improvements to daily life cannot be proven, the development cannot be considered ‘sustainable’ and the plan will therefore be contrary to the NPPF. The provision for all future generations mirrors that envisaged in the NPPF for the Green Belt: an essential characteristic of the Green Belt is its ‘permanence’ (NPPF, 79). Even the draft Local Plan makes this point in policy P2 (4.3.11): ‘The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open’. GBC surely appreciate the meaning of ‘permanently’, which can only imply that they are deliberately ignoring this issue: one cannot keep land permanently open by locating 65% of new development on it.

Paragraph 159 from the National Planning Policy Framework requires the Strategic Housing Market Assessment to identify the housing that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change. The problem for this task is that projection of migration is extremely uncertain at the moment. This is particularly important because, as noted by the report for GBC by Edge Analytics in 2013, international migration has been a large proportion of population growth in Guildford Borough over the past decade, increasing over the past few years, especially since 2009. About half of the increase in population predicted for the SHMA regions is attributed to migration (paragraph 4.16; see also figure 9 of the previous draft SHMA). That the housing ‘need’ is indeed a very subjective quantity is clearly evident from the document ‘Guildford borough. How many new homes? Background paper, October 2013’. That document gave 11 estimates of housing ‘need’ for the borough, each based on different premises. Figure 18 of that report gives a summary plot of the estimates of yearly housing ‘requirements’ over the next 20 years, which makes 2 points crystal clear:
• The large spread in the distribution of estimates of annual ‘need’, and therefore how subjective the figure is. There is no ‘right’ housing number for the local plan as the Lead Member for Planning and Governance so naively thought at the time: estimates of ‘need’ will be a function of the respective priorities subjectively placed by individuals upon factors such as business development, staffing requirements, migration, adequacy of infrastructure, permanent sanctity of the Greenbelt, political considerations in Westminster etc.
• How large the GL Hearn / Capita Real Estate estimate of ‘need’ is compared with most of the others.

Given the subjectivity, it takes the biscuit that GL Hearn / Capita Real Estate specialists should have criticised the prior output of Edge Analytics specialists (section 4.7 and Table 12 of previous draft SHMA), who, in turn, themselves criticised the first draft produced by GBC specialist(s), adding into the mix the specialism that only the POPGROUP computer programme can provide. Is this not the perfect example of how planning has become the ‘preserve of specialists rather than local populace’?

Even Capita Real Estate's 2015 SHMA report itself considers sensitivities about its preference for the proposal of 517 dwellings per annum for Guildford Borough that range from 239 to 744, a ratio of 3:1. Such uncertainty in figures implies a very weak basis for calling circumstances sufficiently exceptional that the boundaries of the Green Belt must be altered.

Returning to the issue of migration, stated Government policy for the past 6 years has been to reduce national net immigration numbers down from ‘hundreds of thousands’ to ‘tens of thousands’. The new Secretary of State for Exiting the European Union, the Rt. Hon. David Davis, is also committed to modifying the principle of freedom of movement of people within the EU and so honouring a key persuasion of the majority of the national population that voted for ‘Leave’ in the recent referendum on whether the UK remains within the EU. A main reason why the 'Leave' result occurred from the referendum is because a majority of the indigenous population is exasperated with politicians pursuing policies that crowd increased numbers of people into their surroundings and result in a deterioration in their quality of life. A reduction in EU migration will surely result if a reduction in the free movement of EU citizens into the UK is negotiated in the near future: such an outcome is highly likely and therefore immigration is more likely to full more than that projected by Capita Real Estate in future years. Estimates of the numbers of homes required for net immigrants in Guildford Borough should reflect the strong possibility of these migration reductions and be themselves correspondingly reduced: the assumption by Capita Real Estate of only a small decline in international immigration to the Borough must be a worst case scenario. A factor of 1/10 (say 10,000/100,000) in migration is more appropriate. Intuitively a policy of no net migration might be more widely supported by the local population, despite it being labelled ‘inappropriate’ according to the Capita Real Estate ‘specialists’. It is pertinent that net total migration into Guildford Borough is only predicted to be positive because of international migration: without foreign immigration, net migration into the Borough would be significantly negative (net internal migration efflux of 500 to 1000 persons per annum according to figure 15 of the SHMA). Such an efflux would approximately cancel the natural growth of the Borough's current population, leading to zero extra housing requirement.

Migration does not equate to housing ‘need’: by definition it is extra to indigenous need. Migration should be catered for in terms of housing plans only if that migration is generally and democratically seen to be of positive benefit to the local community, in both economic and social terms. The question of economic benefit from migration is a hotly contested subject. Although studies show that, initially, immigrant young working people make a positive contribution to the economy, over the longer term immigration is a net drain on the public purse (to the tune of £95 billion nationally over 1995-2011)4. Given a weak, possibly non-existent net benefit from inward migration, compared with the definite degradation of their environment and daily lives, it is a confident bet that most residents would opt for a lower quantity.

It is also quite uncertain that the large-scale immigration proposed in the draft plan will erase the differences in life expectancy that have identified between affluent and non-affluent areas in the Borough: such differences may indeed be exacerbated by the influx. Population growth, by itself, is no guarantor of increasing wealth per capita5. Capital- and knowledge-intensive postindustrial societies sustain the highest growth rates: these are not necessarily associated with large population growth rates.

In other words the future ‘need’ for housing is anybody’s estimate; it is a very subjective entity, dependent upon the bias of the estimator: Capita Real Estate has erred on the high side given their predilection towards development. To predict and provide for such a large housing number could well be a self-fulfilling prophesy, but producing little benefit to, and more likely a negative effect on, the borough’s economy, let alone its social cohesion.
With the bullish estimates of net international immigration included in its initial demographic projections, Capita Real Estate predict a population increase of 15% for Guildford (21,179; SHMA table 13). But Capita Real Estate then further amplifies housing requirements (SHMA, 10:38, figure 63), such that housing would increase by 25% over the current number of homes in the Borough over the period of the plan. But, historically and generally, numbers of houses are tightly correlated to populations, so, contrary to the token logic, Guildford Borough population would grow by about the same 25%. Consider that the population of the whole UK is projected to grow by only ca. 11% over the same period (growth from 64m to 73m over the 25 years from 2013 to 2037, proportioned to a common 20 year time period). In other words Capita Real Estate are recommending that Guildford Borough cater for housing a population growth that is over twice as large as the national average! So a borough which provides some of the most beautiful scenery in the UK (certainly in the over-populated South-East), and which comprises 89% Green Belt on which the Government places great importance, is to take more than twice its share of the national population growth! This is perverse.

Key within that perversity are the factors that increase the annual extra housing requirement up from 517 to 693 (SHMA, 10:38, figure 63): Student Growth Impact (25); Improving Affordability (31); Supporting Economic Growth (120). The additive nature of these amendments is naïve, and did not the historical population growth include any student growth or support for economic growth? Will not the extra, extra population growth, from 15% to 25%, require even more houses to account for the factors of affordability and economic growth? Or will the affordability and economic growth be diluted by being spread across that extra, extra population growth? Guildford resident Lewis Carroll would have appreciated such logic, and the draft Local Plan might well be entitled “13,860 Alices Through the Looking Glass”.

Building more houses to improve affordability is equally naïve. It is often stated that increased house building will lead to lower prices that will be more affordable by the local population: this is fallacious. The mechanisms of house prices are complex, but to a large extent they are governed by the availability of money for potential buyers; at the moment with very low interest rates, mortgages are cheap and prices have risen as a consequence. Such low interest rates are unlikely to continue for much longer. In addition, there is effectively an infinite market for housing in the borough given its current attractiveness and current national immigration numbers: build more houses, such that their prices drop infinitesimally, and more migration will occur to fill them and sustain the prices. The process is self-defeating and would lead to exponentially increasing housing numbers. Simon Jenkins wrote perceptively on these topics when the NPPF regime was first imposed. It is noteworthy and reprehensible that Capita Real Estate is not open about, nor gives proper justifications for, these hikes in housing numbers, even despite a Freedom of Information request.

Even more perverse, 65% of this inflated local growth is proposed by GBC to be located in the Green Belt, which implies that Green Belt growth in Guildford Borough will be far greater than 25%. West Horsley is proposed to be most severely affected, to suffer a 35% growth. Has anyone at GBC seriously considered the implications of that sort of expansion in a rural village: another 35% school places required; another 35% cars on the roads, constricted in many places by continual roadworks as the network attempts to cope; another 35% patients and medical staff at surgeries; another 35% passengers crowding onto already over-crowded trains; another 35% pressure on sensitive natural areas? Over the 20 years daily life being constantly disrupted by the development.

This is not sustainable. Already, as GBC themselves admit, ‘This growing population places pressure on our existing infrastructure and services like roads and schools. The demand for school places is high and access to amenities such as open spaces struggles to keep pace with Guildford borough’s popularity. Travel demand is concentrated in certain parts of the borough, creating high levels of congestion during peak times.’ These are factors that should have been included in the Sustainability Appraisal by AECOM Infrastructure & Environment UK Limited, rather than the restricted selection of 18 issues given in its paragraph 4.2. This firm is a subsidiary of AECOM, a worldwide group making money from development, whose headquarters are located in Los Angeles, USA, again hardly describable as local champions of empowerment for local people in accordance with the supposed spirit of the NPPF! Incidentally just how competent is AECOM Infrastructure & Environment UK Limited given that its accounts were overdue at Companies House on 18 July 2016 (the last day of public consultation)?

Furthermore, despite the proposed extra housing, there will almost inevitably be continuing shortages during this 20 years as the extra urbanization of the Green Belt will have a magnetic effect. It is naïve to imagine that a massive building programme of ‘mixed housing’ will bring down prices as a consequence. So, unless GBC learns a lesson, there is more likelihood of the pursuit of growth continuing and even acceleration beyond that period. Given how much extra development is proposed in this 2016 draft Local Plan compared with that of 2003, how long might it be before another revision of the plan is called for and further erosion of the Green Belt ensues?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1204</th>
<th>Respondent:</th>
<th>8672993 / Kes Heffer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1) Revised figures for future population growth: I object to those produced by GL Hearn[1]

The GL Hearn Addendum report identifies a need for 12,426 homes in Guildford Borough between 2015-34, equivalent to 654 dwellings per annum. This is 17% above the starting point demographic projections.

So in 3 years GL Hearn has managed to change its ‘objectively based’ estimate of how many homes per annum are required for Guildford from 652 in 2014 to 693 in 2016 and back to 654 in 2017. And what has happened during that period to cause the changes in these superficially accurate estimates? Why, the UK has decided to exit the European Union with the intention of reducing freedom of movement and therefore inward migration. Goodness knows how much the Council taxpayers of the Borough have had to pay GL Hearn for the expertise which has gone into increasing over the 3 years the estimate by that extra 2 homes per annum, with a slight wobble in between.

But in truth the exercise is an expensive charade. There is no ‘objectivity’ in estimating future numbers. Estimates of future trends by individuals, or even individual organisations, are always subjective and consequently usually turn out to be wrong. In fact, it has been demonstrated in many different fields that the average values chosen by many different individuals or organisations, even inexpert ones, can outperform single expert opinions.

“Wisdom-of-the-crowds research[2] routinely attributes the superiority of crowd averages over individual judgments to the elimination of individual noise an explanation that assumes independence of the individual judgments from each other. Thus the crowd tends to make its best decisions if it is made up of diverse opinions and ideologies.”

No exercise of gauging crowd estimates of required homes has been officially organised, although over 30,000 objections to GBC’s 2016 draft Local Plan might have provided some evidence that it has estimated very much on the high side. Of course the charge of self-interested NIMBYism might be levied on those objections, so let us instead take as a source for multiple and heterogeneous estimates of housing requirements a document published by GBC itself, even though it was nearly 4 years ago: “How many new homes? A background paper” by GBC October 2013[3]. Although from one, let us charitably say unbiased, publisher it did at least use various different methodologies to estimate housing need. From the Executive Summary:

“The options look at the future need for homes between 2011 and 2031 from three different perspectives, official CLG projections, demographic trend based, job-led and dwelling-led data. We have used projections to generate these options, as they are the best available evidence” (my italics).

These 3 different approaches, each with multiple sub-options, led to estimates of housing requirements per annum of: (a) 704, 415-474; (b) 591-674, 181-226; (c) 358-426, 572-655, 464-540; (d) 312, 322, 1066.

In the above there are 17 estimates (taking the upper and lower limits of each range as separate estimates) of required homes per annum over 2011-2031. They range from 181 to 1066. The mean of the estimates is 507 and the median (as many estimates below as above) is 474. For a pictorial view of the numbers, below is a full distribution of estimates from ‘How many homes?’, also showing the estimates from GL Hearn of 2014, 2016 and 2017.

[Chart]

As an indication of how high is the latest GL Hearn addendum estimate of 654, it falls into the uppermost quartile of the normal distribution fitted to the 17 GBC estimates in ‘How many homes?’ And yet GBC prefer this higher number from the development biased GL Hearn consultancy; possibly because those numbers are consistent with its own expansive development schemes? Of course the exercise of estimating the required number of homes cannot be treated in terms of just statistics, but neither should it just be relinquished to a single development-dependent organisation, however expert, in 3 closely spaced years; naturally that organisation would be expected to, and did, provide self-consistent numbers in order not to ‘save face’, even despite contra-indications from many other people and organisations. For particular example, the consultant commissioned by West Horsley Parish Council, Neil McDonald, possessing equal, if not greater, expertise than GL Hearn, has examined[4] the latter’s addendum figures and also found that they overstate the future trends in Guildford population. In particular he states:

“It seems probable that the under-recording of out migration has continued after 2011. This has major implications. In particular, the ONS’s 2015 population estimate for Guildford may over-estimate the district’s population and DCLG’s 2014-based population projection may overstate the likely increase in housing by a substantial margin. An alternative calculation making plausible adjustments to the estimated outflows in the period 2001-15 would reduce the demographically-based estimate of the number of homes needed from 558 homes a year 2015-34 to 404.”

International immigration comprises a key component of the population changes in Guildford. In 2014/15 it was almost 2/3. It is noteworthy that GL Hearn are content to consider that the effect of Brexit on reducing immigration to Guildford Borough is already subsumed within the ONS projections of future population growth.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the use of a housing number based on an opaque methodology that has been shown to be flawed by two separate studies (Cllr David Reeve's analysis of July 2016 and the independent NMSS report commissioned by the Guildford Residents Association of June 2016) and that has then been applied without any constraints to justify an unacceptably high level of housing in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1065  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

POLICY S2 – Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. "4

1. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers

1. NPPF paragraph 14
2. The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “
   Development that meets the needs of the present without compromising the ability of future generations to meet their own ”
3. Including: “empowering local people to shape their surroundings… Take account of the different roles and character of different areas… protecting the Green Belts around them… recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it… Support the transition to a low carbon future… Contribute to conserving and enhancing the natural environment and reducing pollution… Encourage the effective use of land by reusing land that has previously been developed (brownfield land)… Conserve heritage assets… Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”
4. At the time of writing, about £8billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.

derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.5 The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

2. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14696  Respondent: 8694977 / James Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In brief all these plans must be co-ordinated together, and before that a fundamental review of housing needs be undertaken.

It may show that some of the dilemmas do not have to be solved at all!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/109  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I do not think there is sound evidence for the number of homes needed. There needs to be more explanation of how these numbers have been arrived at.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3412  Respondent: 8703585 / N J Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6150  Respondent: 8703585 / N J Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local plan should be withdrawn (again) and not reissued until such a time that proven agreement from residents has been obtained

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4069  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As far as I am aware no Councillor or Planning Officer has ever ben to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area effected, they feel that they are correct in putting these plans forward (NIMBYISM).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11496  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Firstly I OBJECT to the enormous amount of paperwork involved in this second draft Local Plan – total overload and to make it worse we have only been given a mere 6 weeks to read it with no consultation period during the most busy period of the year. No doubt what you were hoping for…………..

It is therefore highly unlikely that you will get the amount of responses that Guildford deserves as we are all fed up having to write and re-write and then there are the so called “hard to reach groups” you have talked about in the past. As from my experience so far, the majority of residents do not even know what the Local Plan is and have certainly not read it so will not be making informed comments on the issues that may well affect them and their families in the future.

These “hard to reach groups” still exist and will likely not be responding:

- the young and busy working people.
- the elderly who live alone and have no support from family or neighbours.
- those with limited IT skills – not owning a computer for access to information.
- ethnic groups - those with limited English language skills.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11233</th>
<th>Respondent: 8708289 / Frances King</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), isLegally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Various Sites along the A3/A31 Corridor: I OBJECT not only to site A35 mentioned above but the various other sites that have been proposed along the A3/A31 corridor. These, apart from the brownfield site at Slyfield, are all on open agricultural land currently in the Green Belt. The destruction of swathes of Green Belt and open countryside when brownfield sites in the current urban envelope are available is wholly contrary to the NPPF guidelines. It will mean there is continuous built up land from Junction 10 of the M25 to the North East of Guildford to the junction of the A3/A31 to the South West at Blackwell Farm. There can be no justification of “exceptional circumstances” to cut into the Green Belt and countryside in this way.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15011</th>
<th>Respondent: 8708545 / Nigel Wicks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I write to object to the Guildford Borough Proposed Submission Local Plan (June 2016). I set out below my objections to specific policies and matters within the Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>First, let me say that I believe that the scale of development envisaged in the Plan is not in the national interest. There is considerable agreement that economic development in the United Kingdom is unhealthily skewed towards the south east of the country. The proposals in the Plan would intensify such development. It is in the interests of the country at large that development in our region should be restricted so as to provide incentive to take place in other regions less favoured than ours. I therefore object to the scale of development envisaged in the Plan and ask for it to be materially reduced.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15016</th>
<th>Respondent: 8708545 / Nigel Wicks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing units being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from that of all the other Borough Councils in Surrey. No justification is given for this differentiation.

The housing number is based on pre-Brexit data for economic and population growth, including migration. This number needs to be revised downwards.

The critiques of the Strategic Housing Market Assessment (SHMA) submitted by Councillor Reeve and by the Guildford Residents’ Association provide compelling justification for materially reducing the proposed number.

As a result of the juxtaposition of Guildford with Woking, Guildford residents are effectively being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The Plan in general and this policy in particular does not address the fact that Guildford exists as part of London's commuter belt. The Plan also ignores the fact that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

It is unreasonable to embark on a radical transformation of the borough on the basis of this unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). This would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban. The needed housing should be provided by concentrating development on urban brown field sites and by increasing the housing density of existing built up urban areas.

The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

The strategy adopted in the Plan represents disproportionate development in the north east of the borough as a result of the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Currently these three Wards represent only about 11% of the existing housing in the borough and are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. This would result in the coalescence and a merging of identities of the surrounding villages. In short, the Plan is unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that in Policy S2 the reduction in numbers is mostly in the area of Normandy/Flexford. As a consequence the burden of development falls even more disproportionately on the East of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website
openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4718  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY) as follows:

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/9392  **Respondent:** 8715777 / John Sansom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2606  Respondent: 8717697 / Michael Henderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my serious OBJECTIONS to various aspects of the proposed GBC Local Plan published recently.

The proposed scale of House building of 13,860 new homes over a twenty year period represents a 25% increase in the housing stock of GBC which is indefensible and is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17060  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the disproportionate (in terms of population density) allocation of housing to the north east of the borough in the wards of Clandon and Horsley and Lovelace in
- I object to the overdevelopment of sites, particularly the large sites, the density of housing proposed for site allocation A35 is higher than in most London Boroughs – this proposal is urban in nature and completely out of keeping with its surroundings
- I object to the fact that many of the allocated sites are being planned in unsustainable locations
- I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper cycle lanes on local roads (and the space to provide them)
- I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper pedestrian footpaths on local roads and the requisite street lighting to ensure the safety of Much of the borough is RURAL IN NATURE and residents specifically do not want to live in well-lit areas more akin to urban living.

- I object to the insetting of villages from the This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
10. I object to the fact that air quality concerns have not been taken seriously – air quality in many parts of the borough is in excess of the EU permitted levels. Additional traffic will exacerbate this situation impacting the health of all current and future residents.

[...]

17. I object to the impact of excessive development on the already congested Strategic Road Network particularly on the A3 and M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11625  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The number is based on EU projections for economic and population growth, including migration. These now need to be revised downwards, due to our exit. The area is artificial, and so are the housing numbers artificially high.

It is not clear why Waverley is included in the SHMA and not say Mole Valley. Guildford borough is unique and should be treated as such. These concerns have been raised since 2014 but the Council have failed to seek good data.

No public consultation on the SHMA and no scrutiny. The method has not been disclosed therefore one one knows whether the numbers are completely fabricated. This is not a good basis for our Local Plan.

University Student housing should not be counted in the SHMA.

Most of Guildford borough is meant to be protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). This would be a major and irreversible change, a largely rural borough into a suburban one like Woking, if residents wanted to live in Woking we would, its cheaper and has lower house prices. A substantially lower housing number would remove the need to build on Green Belt.
### Comment ID: PSLPP16/9050  Respondent: 8723809 / Sally Blake  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

#### I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

### Comment ID: PSLPP16/3223  Respondent: 8726529 / Eric Palmer  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

#### 1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3494  Respondent: 8726529 / Eric Palmer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1705  Respondent: 8726689 / David Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/928  Respondent: 8726721 / Rosemary Mitchell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
When assessing the need for development in the local rural areas I want to know how the council proposes to determine whether there is true local need. Under the last local plan the only housing development allowed in the villages was supposed to be for people within the parish. The recent social housing development in new road Gomshall has been mostly filled with people from outside the parish. How does the proposed local plan address this and what assurances have we that self interest on the part of planning officials will not take precedence.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12873</th>
<th>Respondent: 8727457 / Nuala Crampin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The whole plan is based on the premise that growth and expansion of business and population is a desirable objective for Guildford; I strongly disagree with this as if it is achieved it will change the character of the borough from that of a busy market town to that of city. Residents of Guildford have chosen to live in the former, not the latter. I therefore do not accept the excessive figure for the estimated housing need.

The plan proposed puts too much emphasis on expanding retail capacity within the town at the expense of allocating town sites to housing development. The need for retail premises is in decline due to online shopping, and housing development should be built at high density on town sites in order to preserve the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12879</th>
<th>Respondent: 8727457 / Nuala Crampin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In conclusion I do not see the borough council to be acting in the best interests of their electorate in the draft plan as they will be destroying the environment and character of the area in which we have chosen to live. Indeed much of what is proposed seems to be in the best interests of property developers, and there seems to be little regard for the views of residents expressed in the previous consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9710</th>
<th>Respondent: 8728161 / Judy Kennedy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

S2 Unfair concentration of housing development and overturning of Green Belt sites to the west of Guildford. Once again, it seems that the villages to the west of Guildford are the target of GBC's development plans and I object to an apparent uneven policy of distribution within the Borough.

Lord Onslow's proposal to develop 1000 new homes, a new school and sports facilities on Clandon Golf Course, Merrow is an excellent and practicable idea and it is curious that it is absent from the overall draft Plan. The site is well served by a good road system, with excellent access to the A3/A25/M25 thus avoiding the need to circumnavigate the congested roads of central Guildford. The schools on that side of Guildford (St. Peter's, George Abbot, Howard of Effingham) are popular and would benefit from an additional secondary school in the area. It's a win/win idea for Lord Onslow's proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9473  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Local Area Definition

Guildford Area only defined as Waverley and Woking as well as Guildford – Guildford entwined will be hit by other implications from Rushmoor and the further to the west. Much of this passes through Guildford in the rush hours. These concerns have been raised since 2014 but the Council has failed to seek better market data.

The OAN / SHMA Process is flawed

The Local Plan evidence base should be open to scrutiny. How can we scrutinise the OAN on 693, when the assumptions and calculations underlying the result are hidden. The Council propose we should trust them, as the contractors’ model is used by a large number of other local authorities.

Widespread usage in no circumstances mean it is right for Guildford, and Guildford itself has some rather special circumstances, being that it is dominated by the University of Surrey. The Office of National Statistics acknowledge this, yet no mention is made of the implications of the massive and temporary resident student population on the long term population forecasts underlying the model.

Brexit has made the large immigration assumptions used in the SHMA rather suspect too.

For reasons I do not understand Guildford Borough Council failed to scrutinize the SHMA, and recently altered the petitioning rules in March 2016 to avoid a full public petition on the matter going into debate.

The hidden model belongs to consultants G L Hearn, whose website openly proclaim their pro-development agenda, leading me to the reasonable suspicion that the figures are not right.

This lack of debate and closed process, undermines the validity of the whole consultation. It is unreasonable to ask us, the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
**Outside Analysis**

Guildford Resident Association commissioned a critique of the housing number “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. This suggests the target should be 510 per year (before constraints) rather than the 693 which appears to be set and applied.

The Campaign for Rural England has also done a critique exercise they will be submitting, which we believe leads to a similar conclusion on numbers.

**Constraints should be applied**

Constraints are fully justified and need to be applied in accordance with para 166 of the NPPF.

- The borough has major traffic and access problems,
- The town is gridlocked in rush hours
- The A3 is gridlocked in rush hours
- Minor roads are overloaded
- Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).

Guildford residents cannot take such a large increase in housing target on trust but that is what we are being asked to do. As the number is not explained it is difficult to argue with.

**SHMA is Pre Brexit**

Even the 510 would be substantially low if Brexit implies a limit on international migration, as international migration is driving the majority of the population rise.

**The University Impact**

The University has approximately 14000 FTE students, half of whom live off-campus. This means that around 7000 students live in the town centre, occupying homes that could be made available for University staff and other key workers.

The housing need has to be completely rethought in light of the student impact. There is no policy for students and I feel - as outlined below - this is a serious omission, with nearly 1 in 5 of the Guildford Town population being a student.

Let’s begin with the history, and previous promised. The University has been woeful in meeting its promises made in 2003 to build one student accommodation place for each extra full time place. I specifically refer to the University of Surrey’s agreement to build 4790 student residences, and 300 staff residences to support its expansion in the Manor Park Development Brief (MPDB) in 2003. To date only around 1665 residences and 30 staff houses have been built, while the University has expanded by 5850 full time students (SHMA Appendix C).

Over the same period it has expanded by around 6000 students, placing a huge burden on infrastructure, and forcing the population out of the town as the student move in.

In the same 2003 Local Plan – the University committed to 60% of full time students on site. It currently admits to 54%, but with 11523 (under and post graduate) full time students (SHMA appendix C) and only 5100 accommodation units (SHMA Appendix C) this is calculated 44% on site. The current University Estates Plan of 2009 states clearly the University only plans for 42%. This is a direct breech of that 2003 agreement. We note the slight fall after 2011 is more likely to do with the introduction of student grants, than a plan reduction by the University as stated in SHMA Appendix C.

Increase Students on Site. We note that other councils such as Oxford which have a similar scale University challenge have solved this creatively, by seeking agreements for student numbers between 80 and 85% on site. OBC motivate the University colleges by effectively blocking any development until this is agreed and adhered to.
I therefore believe that the proposal of 60% of students is wholly insufficient. Guildford needs a policy to ensure that the University accommodates 85% per cent of its students on its existing campuses. This policy would quickly free up 1000+ houses currently denied to the residents due to the advantages of high returns offered in renting to Students by privet landlords. These properties would be in the town centre, close to the University and railway station, where they are sustainable and needed. An easy win.

If this were to happen a natural result would be fewer traffic movements, and fewer problems with students parking in residential areas. Students living on campus are less likely to bring cars. (In parts of Ashenden there are four cars per student house) NB In 2003, the University promised that Manor Park would be a “world-class car-free campus”.

Under a 2004 Section 106 agreement (Section 15), Hazel Farm will be released by the University to provide housing for Guildford once 2,500 units have been built on Manor Park. Whilst the site cannot be used for family housing (because of its proximity to Whitmore Common SPA), Natural England would allow the site to be used as a care home. This usage would seem appropriate given the ageing population often cited as being a reason for population growth, and it would help towards Guildford’s housing supply numbers.

This is all good. Also

Seven out of the top-10-ranking US universities accommodate more than 86% of students on campus - Harvard has 98%.

Oxford City Council’s Local Plan includes a policy which limits the number of students in the private housing market to 6,000 out of a student population expected to reach 40,000 in the near future.

The University has ample space on its Manor Park and Stag Hill campuses to provide this accommodation.

Student preference is an argument that the University has used in order not to build its student housing, however the majority of students attending Oxford University are not given the option to live in shared accommodation in town, and this does not prevent them wanting to go there.

Many students actively want to live on campus and want the security of knowing that they have a roof over their heads for three years. The student halls are filled every year. A number of students, for example in Onslow Village, would have preferred to remain on campus, but say they were unable to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1906</th>
<th><strong>Respondent:</strong></th>
<th>8728865 / Neville Bryan</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Object - All original objections remain

A modified target of 12426 houses still does not reflect local need or conditions. Conversely changing the target based on a SHMA document which remains unexplained adds to the accusation that the number is made up, rather than calculated based on a clear set of assumptions. Guildford is a town of 70000 residents, and we have a University of 14000 students. Under any definition that is a monopoly. The affect this has had on the town, and housing is dramatic. Guildford residents association (GRA) have employed a professional analyst (Neil MacDonald), and I would defer to his report and conclusions, on numbers and lack of transparency. [https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf](https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf)
We should NOT be taking unfulfilled housing needs form Woking and Waverly. We have no space for our own.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17889  Respondent: 8729025 / Richard Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In response to your Draft local plan, requiring responses by 18/07/2016, I must strongly object to the proposed development on Blackwell Farm.

Greenbelt should be a last resort

There are plenty of brownfield sites that can be developed to provide a proportionate quantity of extra housing capacity, if strategically planned for the long term. Building on greenfield sites should be a last resort only when all brownfield sites are exhausted.

Building on greenfield sites because there are insufficient brownfield sites available as a tactical short term option is not a good enough reason to take greenfield.

Any perceived lack of immediately available brownfield sites is due to a historic lack of strategic planning and a continued lack of long term strategic planning. What is being proposed is an excessive tactical build to make up for these short comings.

The plan needs to fit the land becoming available, not the land fitting the available plan. Reduce the target numbers of new home to only what can be built without taking green field.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2037  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the commitment to build 12,426 homes (Policy S2 (1)), based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn. The objectively assessed need (OAN) figure of 12,426 has been inflated and does not apply any of the constraints required under the NPPF and the National Planning Policy Guidance.

Inflated OAN

The Strategic Housing Market Assessment (SHMA) modelling has been found to be unreliable. A detailed, professional review of the Guildford and West Surrey SHMA, undertaken in June 2017 by NMSS on behalf of the Guildford Residents Association and Parish Councils has shown that the demographic and economic need figures put forward are
fundamentally flawed. The NMSS analysis highlights a large gap between projections and census figures in Guildford and identifies under recording of students moving away as the most plausible explanation. It concludes that if this recording error is corrected by making plausible adjustments for the outflow of students in the period 2001-15, this would reduce the demographically-based estimate of the number of homes needed from 558 homes a year during 2015-34 to 404 per annum[1].

Failure to apply constraints

According to the INRIX 2016 Traffic Scorecard[2], Guildford is the town with the worst traffic congestion in the UK, and its congestion is worse than many major cities, such as Glasgow, Cardiff, Liverpool, Bristol, and Southampton, making it the sixth worst congestion hotspot in the UK (Table 1). Furthermore, there is no resilience in the road network, and when incidents occur almost the whole of the borough is gridlocked. Figure 2 shows what happens to the network on the west of Guildford when there is an accident on the A3. This screen grab of traffic was taken on 14 April 2017.

In planning its spatial development strategy, GBC does not appear to have taken the borough’s traffic problems into account. Nor has it taken into account the fact that 89 per cent of the borough lies within the green belt and that 64 per cent lies within the AONB. The neighbouring borough of Woking has reduced its OAN by 50 per cent as a result of constraints, and yet it has a lower percentage of green belt (60 per cent) and no AONB. Woking is also less congested. It seems a nonsense that Guildford should apply zero constraint (on the grounds of traffic and landscape) to its OAN and then seek to provide for the shortfall of a neighbouring borough, which is less constrained. It would appear that GBC’s refusal to apply constraints is driven by the Lead Councillor’s wish to maintain higher housing figures, as evidenced in his statement to the GBC Council Meeting on May 15, 2017:

“I’ll take the objectively assessed need as it is at 12,426, but I can tell you I’m not going to celebrate the fact that the number has come down.” (Cllr Paul Spooner, GBC Council Meeting, May 15 2017)

This suggests that, given a choice, Cllr Spooner would wish to build over the green belt, as this is a direct consequence of a higher housing number. It seems that the real driver is to boost the size of Guildford and its economy rather than to meet housing need at all, and this has resulted in the opportunity being taken at every turn to adopt the higher housing figure within the SHMA modelling. Unfortunately, Cllr Spooner has overlooked the fact that traffic congestion is detrimental to Guildford’s economic growth. A business survey carried out by GBC in 2008 found that the main reasons, given for businesses moving out of the borough – aside from the cost of property – were transport and congestion. Traffic problems are also cited as a deterrent to businesses setting up in Guildford[3].

Given that boosting housing provision is unlikely to make housing in the borough more affordable, it is incumbent on the Council to deliver a Local Plan that will encourage (per capita) growth and therefore will not exacerbate existing traffic problems.


Table 1: INRIX 2016 Traffic Scorecard – UK’s 10 most congested cities/large urban areas

Figure 2: Typical build-up of traffic on Guildford’s local roads and on A31 Hog’s Back following an accident on the A3 - 14 April 2017

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: ✉️ KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

The house numbers proposed are unsubstantiated and require further review given the new economic and political climate since Brexit decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6697  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website
openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/8259  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the Council's intention to declassify large areas of Green Belt in and around the borough and, in particular, the proposed excessive number of houses earmarked for Send and adjacent parishes. My reasons for objecting are as follows:-

- the housing numbers have been calculated on flawed data
- it will result in urban sprawl which is precisely what the Green Belt was designed to protect
- in addition to the earmarked sites, removal of Green Belt status will open the floodgates for further planning applications from developers and local landowners
- there is insufficient infrastructure to support such wholesale development
- local schools are at capacity now
- roads are at a standstill at peak times already and building on this scale will add hundreds more vehicles
- the Villages Medical Centre is already running to stand still

The plan has been fraught with controversy from its first airing and, despite overwhelming opposition to most of its proposals, planning councilors have completely ignored the 20,000 odd written objections. I object most strongly to the plan and trust that if Guildford Borough Council doesn't rethink its position, the planning inspector will reject it altogether.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/112  **Respondent:** 8732321 / John Freeland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to Policy S2 - Housing Number:-

- Guildford Borough Council (GBC) has chosen to ignore the professional advice of Neil MacDonald of NMSS and conjured up a proposed housing target of 12,426, which is clearly based on flawed data and based on criteria that has not been made public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13918  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guilford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Section page number 141 of Document page number 842
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15788</th>
<th>Respondent: 8732993 / Michael Weber</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. In any case, Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or...
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3190  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the **housing number of 693 houses per year** from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3191  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the **disproportionate allocation of housing** in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/547  **Respondent:** 8733857 / Tony Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Housing number – POLICY S2**

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-
ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4445  Respondent: 8734241 / Andrew Ingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a Horsley resident I also object to the proposals to squeeze large numbers of homes into local villages that just do not have the infrastructure to support them. These villages are part of our unique English Heritage which should be preserved at all costs, especially considering their proximity to the built up suburbs of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4447  Respondent: 8734241 / Andrew Ingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Additionally I also object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9920  Respondent: 8734721 / M Bruder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to

14,000 (690 per year) is unjustified, unproven and been subject to scrutiny.

The number excludes currently granted permissions and potential windfall sites which extends this number even higher.
This number is too high and is leading to numerous issues around lack of infrastructure and inevitable encroachment on Green Belt; there is lack of protection for our countryside.

At this level there are certain to be delays that will create problems down the line with pressure to bring in locations currently excluded.

There is no specific policy in the Local Plan to prevent inappropriate development within current communities such as Fairlands, e.g. garden grabbing. Which the government has stipulated should not be part of development plans. As above delays elsewhere will lend weight to such applications in order to meet the excessively high number. There needs to be a specific policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12920  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website...
openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1328</th>
<th>Respondent: 8740321 / J McClellan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the number of planned houses rising from 652 to 693 over the next twenty years. The way this has been assessed and calculated is not at all transparent and is more than double figures used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5110</th>
<th>Respondent: 8741377 / Lisanne Mealing</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Borough Wide Strategy (Policy S2)

There is too much proposed development in a small part of the borough in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between the M25 and Burpham, which will merge all the villages and their identities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/996</th>
<th>Respondent: 8742689 / Keith Michel</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We have carefully considered the new version of the Local Plan and recognise the significant time and expense that has been incurred in preparing it for public consultation.

Having done so however, we take the view that the essential basis of the Plan is open to question because, it seems to us that the total number of new houses and dwellings stated as required during the period of the plan is seriously over estimated.

The immediate result of this over estimate is the need to locate numerous potential development sites in areas presently situate in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2041  Respondent: 8742689 / Keith Michel  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We remain of the opinion previously expressed that the essential basis of the plan is open to question as there seem good grounds to consider that the number of new houses and dwellings stated to be required is seriously over estimated. One reason for this, as can be seen in East Horsley, is the increased willingness of GBC planners to permit the demolition of older smaller houses and bungalows in favour of larger modern houses that are frequently out of keeping with the local amenity and significantly reduce the opportunity for existing residents who wish to stay in the area to "downsize".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/983  Respondent: 8742817 / C.P Backhurst & Co Ltd (Andrew Backhurst)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to support the Guildford Plan but feel that improvements need to be made to it before it is approved. I fully except that home need to be built and a certain amount of green belt land will need to be surrendered over the timespan of the plan to meet the housing numbers. It is important that Guildford Borough Council looks at all of the brownfield sites within the greenbelt that could be used before agricultural land is developed on. In Normandy a huge greenfield development is proposed that will substantially change the village for the worse. I feel it would better suit the village to build on our 10 acre brownfield land at Strawberry Farm. Our business has operated from this site in Normandy for - lover 50 years, but, because of the nature of the business with its many heavy lorry movements per day it has not always met with the approval of many of the residents. Removing this business from this site and replacing it with houses I am sure it would be viewed by villagers as a positive development.

So with this in mind I am proposing that this site be included in the plan.
No evidence has been provided to justify the need for 14,000 new houses to be built in the Borough. Guildford Borough Council have refused to release the data on which this housing need is based and sought to withhold it from wider scrutiny under the premise that it is the intellectual property of a third party and is commercially sensitive. If GBC genuinely believes this housing figure is accurate then they should have the confidence to release the data upon which the figure is based. Not doing so is cowardly, deceitful and only increases the general public's distrust of politicians.

- The referendum result means the data used to derive the need for 14,000 new dwellings must be revisited. One of the assumptions behind whatever model has been used to arrive at a housing need of 14,000 dwellings must have been that the UK would remain in the European Union. Given the country has voted to leave the EU it must mean that any population growth or immigration forecast assumptions used are redundant and will continue to be so until such time as we get a better understanding of what leaving will actually mean vis-a-vis the principle of freedom of movement.

### Insufficient/inappropriate focus on developing Brown Field sites.

The expansion of urban areas to accommodate more commercial real estate indicates the Council is not interested in maximising Brown Field sites for housing purposes. For example, under Policy E7: Guildford Town Centre. it is suggested that 45,000 sq In of land at North Street should be assigned for retail uses not housing.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. In March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online according to the British Retail Consortium and accounting firm KPMG. With such a high swing to online purchasing, retailers will need 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing. Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban locations, near employment and transport hubs.
The proposed housing need is unsustainable. Over development will damage local communities, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. These communities do not need the housing numbers proposed. The Key Evidence document “Guildford Borough Economic Strategy 2013 -2031 makes no case for locating large numbers of dwellings in West and East Horsley or in neighbouring villages. Over 23% of the Plan's new housing is proposed for the localities of Ripley, Ockham, Send and the Horsleys.

Development on the scale proposed in the Plan will require huge levels of investment to provide the infrastructure to support the resulting influx of thousands of new residents. Currently, the provision of primary and secondary education within the area is under considerable strain with local schools being oversubscribed for places. Children who are unfortunate enough to live outside the catchment areas for these schools must travel considerable distances to receive their education. There is only a vague reference to school provision in the Plan despite the potential for hundreds of new homes falling within its catchment areas. This raises the question as to where GBC thinks the thousands of new children will go to receive their education?

There is one GP surgery serving the Horsleys currently. The Infrastructure Delivery Plan suggests a possible extension to the Kingston Avenue Medical Practice. However, here is no evidence to suggest that development of the scale proposed in the Plan will lead to additional GP provision within the timescales of the new development. As such the existing surgery would quite literally be swamped and be unable to provide anything like an adequate service.

The construction of 2,500 homes in the Ockham and Horsleys area will substantially increase the congestion on what are poorly maintained "B" and "C" category roads. It is also fair to conclude that the accompanying increase in traffic volume from such a massive population increase will accelerate the speed that these roads deteriorate and therefore, the frequency and cost of maintaining them. In addition the knock on effect of having thousands of new traffic journeys per day will quite literally gridlock the area, and will directly impact on the traffic flow on both the north and southbound A3 carriageways, and quite probably the M25/A3 junction.

Whilst Horsley station has frequent trains to London and Guildford, it is highly unlikely that the current or future train service provider will improve its peak time service to accommodate the increase in commuters.

There are a number of areas within the Horsleys and Ockham environs which are subject to frequent flooding. Two of the most notable areas, Ockham Road North and the Ripley/A3 roundabout are not even mentioned in the Plan. Failure to address these locations as well as other sites that are prone to flooding is clearly unacceptable.

To conclude, it is my opinion that the Local Plan is flawed, and is riddled with inaccuracies and unsubstantiated conclusions. It is a development-led, not needs based Plan, and has been devised using an over inflated housing target either by design or through incompetence. It is clear that the same type of errors and deceits are being repeated as with the 2014 Draft Local Plan despite the changes to the senior personnel responsible for the Plan.

I urge GBC to stop the current process and set about producing a Plan that is focused on housing need, not economic or commercial growth, and which is based on sound and transparent data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is brownfield land available in the town centre which is being earmarked for commercial
development rather than for housing. This is enough to meet our real needs for affordable local
homes. There are enough vacant commercial sites to cope with genuine business need, and we
have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9681  Respondent: 8743969 / Daphne Padfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that more houses are needed in the South East - in my opinion a great deal more should be done to make the
North East and other areas with comparatively low population growth, more attractive for expansion, but that's another
story. However, I am dismayed at the proposed density and number of houses on the proposed sites. This is not only for
aesthetic reasons but principally because it appears that absolutely no thought has been given to the impact this will have
on the lives of those currently living in The Horsleys.

We, the residents, chose to live in a village, not a town and so we do not expect the facilities which a town has to offer.
But what is proposed in terms of population growth is a town with none of the amenities. In fact the proposal will detract
from those amenities which we do currently have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3910  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. 1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and
does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This
approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now
need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of
Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/313  Respondent: 8746465 / Matthew Tipper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the following proposals specifically:

Policy S2 Borough Wide Strategy
As stated above, I object to the enormous scale of the proposed building programme, which far exceeds the local housing needs. ONS forecast a sustained UK net immigration rate of 200,000 each year from 2014 to 2039. This is already high, and at least double the target, and will account for half of the UK's long term population growth. The current rate is higher still. The ONS also show that of Surrey's population forecast, some two thirds is due to net immigration. The draft plan seeks to build far in excess of local needs. It is not a local Borough plan but instead presents a threat to our county because of our national failure to manage our numbers sensibly. I believe two wrongs do not make a right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/918  Respondent: 8746465 / Matthew Tipper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
It appears to me that the draft plan is little changed in scope from the previous version of 2014. I believe local people should be consulted and heeded; but it seems instead our views are needed as a box ticking exercise in this process, and then ignored.

As advised previously, my objections to the draft plan are that it would make our county and our village, an extension of Greater London. This is based upon estimates of the need for housing, due to inflated forecasts of immigration rates that are probably inaccurate, and certainly unnecessary and unwelcome at this scale.

In prioritising the massive construction implied by these migration forecasts, the draft fails to protect the Green Belt and productive agricultural land and the rural landscapes and character of the county. It fails to address the road and rail congestion and demand for schools and public services should it be implemented. It all but ignores the environmental impacts, such as local air quality, noise and light pollution, road safety, biodiversity loss and climate change. These problems are all too apparent in those parts of the world where urbanisation is unchecked.

In the national context the draft is unable to address the need to promote economic growth in the rest of our country, away from the southeast. But without a national effort to redistribute growth and wealth, any additional housing provided in Surrey would not remain affordable for long, and its provision would only consolidate the economic dominance of London at the expense of our countryside. England has over 45,000 ha previously developed land, enough for at least 1 million homes, but mainly outside London and the southeast (CPRE 2014: From wasted space to living spaces).

Given this availability, no compelling case or "exceptional circumstance" for the sacrifice of the Metropolitan Green Belt is possible. Green Belts have protected our land from urban sprawl for seventy years, and there remains adequate brownfield land for housing nationally. Instead this draft implicitly accepts a high immigration rate as a given, without consideration of ways to manage it. By catering to London's needs, it perpetuates problems of national importance with respect to immigration, the north-south divide, social mobility and environmental harm.

I object to the following proposals specifically:
Policy S2 Borough Wide Strategy
As stated above, I object to the enormous scale of the proposed building programme, which far exceeds the local housing needs. ONS forecast a sustained UK net immigration rate of 200,000 each year from 2014 to 2039. This is already high, and at least double the target, and will account for half of the UK's long term population growth. The current rate is higher still. The ONS also show that of Surrey's population forecast, some two thirds is due to net immigration. The draft plan seeks to build far in excess of local needs. It is not a local Borough plan but instead presents a threat to our county because of our national failure to manage our numbers sensibly. I believe two wrongs do not make a right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2669  Respondent: 8746753 / Miles Hackett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Council not following due process.

Since the last draft Local Plan every site in the village of Send has been changed. Not only locations but also in housing numbers. Even as recently as 5th April 2016 there was a document released giving information on the new local Plan with links to maps and now there are massive changes, even since the publication of this document. My understanding is that following the rejection of the Draft Local Plan the Council could only push forward under Regulation 19 if there was not significant changes. In Send, None of the 485 new homes was included, the site at Garlick's Arch was not included, the land west of Winds Ridge and send hill was not included and the removal Send from the Green Belt was not included. These are major changes to the plan for the village of Send. If this amount of change is to be proposed then we need to go back and have a full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16307  Respondent: 8749409 / Mrs Randall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Reference page 28 Table 1 (Planned Delivery between 2018 and 2033)

The table shows the following increase in homes in the area over the period of the plan:

- Ash and Tongham 91
- Ash and Tongham Strategic location of growth 1241
- Village extensions (including Ash Green southern site) 993*

*no indication of the possible number for Ash Green included in this figure

Since 2013 the following residential developments have been approved:

---

Section page number 159 of 1722  Document page number 860
03/11/15  26 dwellings Spoil Lane
16/07/15  55 dwellings at Grange Farm
21/04/16  56 dwellings at Guildford Road
18/12/13  39 dwellings at The Croft
30/12/13  26 dwellings at Foreman Road
30/12/13  35 dwellings at Poyle Road
30/04/13  60 dwellings at Ash Green Lane West
20/03/14  400 dwellings at Ash Lodge Drive
15/06/16  55 dwellings at Spoil Lane
14/06/16  21 dwellings at South Lane
May 2016  7 dwellings at Wandle Close

Possible and, no doubt, probable:

Under immediate consideration and recommended for approval by GBC:
58 dwellings at Warren Farm
11 dwellings at rear of 57 Manor Road, Tongham

Currently under appeal with the Planning Inspector:
6 dwellings at South Lane

It is possible that not all of the developments approved in recent years have been included above but if just those shown
are added up a grand total of 849 dwellings is achieved (this excludes the application at South Lane currently with the
Planning Inspector).

If this inordinate amount of development already agreed for the area is considered against the numbers put forward in the
draft plan, Ash and Tongham is already well on the way to satisfying their allocation and the Plan hasn’t even been
finally agreed yet! This comment is of course based on the premise that the figures mooted in the Plan do actually take
into account the developments, or at least some of the developments, mentioned above and that the area will not be
expected to absorb a further 1,300+ dwellings up to 2033.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12327  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9/ I object to the total lack of consideration given to the air quality issues the proposed developments would cause given that several of the proposed sites are close to areas which already exceed EU limits. The air quality problem is both relevant to humans and Flora and fauna and there is no reference to the grievous effect increased nitrate deposits would have on the Wisley SPA.

10/ I object to the obvious lack of sustainability of the proposed sites. Poor access to public transport and non-existent cycle or even pedestrian pathways will cause a heavy reliance on car use for everyday tasks such as shopping, commuting, school runs and social activities. The nature of the rural roads and the already overstretched main highways will lead to even greater congestion with the resultant increase in pollution and accidents. No consideration has been made as to the supply of utilities to these distant sites and the necessary installation of these utilities will give rise to further pressures on the traffic infrastructure and local life over a considerable period of time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8579  
Respondent: 8751105 / Amanda Harris  
Agent:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7277  Respondent: 8768161 / Adam Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express the strongest opposition to the proposals, set out in the recent Guildford Borough Council Draft Local Plan document, to support development of 533 new houses in Horsley, of which 385 will be within West Horsley. Additionally, I oppose the extension of the village boundaries for East and West Horsley and removal of the village areas within these boundaries from the protection of the Green Belt. In addition, I object to the inclusion of the Wisley Airfield site as a potential development site.

I believe that the proposals are extremely misguided, and would be highly damaging to the existing communities of East and West Horsley. In addition, they are strongly opposed by the residents of the area, and therefore the plans are at odds with the localism agenda.

I am a Chartered Surveyor with 15 years experience in commercial real estate and over 4 years experience working in urban regeneration. As such, I have a clear professional understanding of the issues involved and also of the economics of development. I have lived in West Horsley for over six years and intend to be a long term resident and therefore am deeply concerned about the proposals set out in the draft plan.

My opposition can be summarised under the following headings, which I will consider in turn:

1. Concern over overall level of housing development for Guildford Borough.
2. Disproportionate housing development for West Horsley compared with other settlements in the Borough.
3. Effect of the Proposals on West Horsley.
4. Effect of the Proposals on the Green Belt.
5. Effect of the Proposals on the Surrey Hills AONB
6. Specific Comments on Potential Development Area at Waterloo Farm/ Ockham Road North.
7. Views of the Local Community in West Horsley.

Overall Level of Housing Development proposed for Guildford Borough.

I am extremely concerned about the overall level and type of housing development which is proposed for the Borough. My understanding is that the overall level of new housing proposed is far in excess of that proposed by other similar neighbouring authorities.
I have seen no clear rationale for the growth projections which underpin the housing calculations. Indeed, the number of new houses proposed for the Borough has increased from the 653 per annum proposed in the 2014 draft documents to 693 per annum in the current proposals.

Of the 12,498 new homes proposed within specific sites, 65% are within the Green Belt. This percentage is far too high and will have a damaging impact across the Borough.

**Disproportionate Level of Housing development in West Horsley.**

Not only do I oppose the level of green field housing development for the Borough as a whole, I also feel that the levels of housing proposed for West Horsley are disproportionate. The draft plan proposes 385 houses in major sites at West Horsley, with another 148 in close proximity within East Horsley. Additional "infill" developments are also proposed. West Horsley is a parish of 1,111 homes, but there are only 723 houses within the main settlement area of West Horsley (i.e. within the village boundaries). Therefore, the proposals for major sites alone would add 53% to the housing stock of the village and 35% to the housing stock of the parish as a whole.

This is grossly disproportionate and beyond the level proposed for other settlements around the Borough and particularly for Guildford itself, which does not seem 10 be taking its fair share of the proposed development.

West Horsley Parish Council has carried out a Housing Need Assessment, which showed a requirement for just 20 affordable homes. The proposals are therefore totally out of line with the requirements of the local community.

**Conclusion.**

In summary, I strongly oppose the current drafting of the Guildford Borough Council Local Plan in relation to West and East Horsley. In particular, I oppose the removal of West Horsley and East Horsley from the Green Belt, the extension of the village boundaries beyond their current extent, and plans for 533 houses across the two villages (of which 385 are planned for West Horsley), all of which are at unsuitably high densities, out of keeping with the current character of the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10217</th>
<th>Respondent:</th>
<th>8768161 / Adam Johnson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Overall Level of Housing Development proposed for Guildford Borough.**

I am extremely concerned about the overall level and type of housing development which is proposed for the Borough. My understanding is that the overall level of new housing proposed is far in excess of that proposed by other similar neighbouring authorities.

I have seen no clear rationale for the growth projections which underpin the housing calculations. Indeed, the number of new houses proposed for the Borough has increased from the 653 per annum proposed in the 2014 draft documents to 693 per annum in the current proposals.

Of the 12,498 new homes proposed within specific sites, 65% are within the Green Belt. This percentage is far too high and will have a damaging impact across the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing to express the strongest opposition to the proposals, set out in the recent Guildford Borough Council Proposed Submission Local Plan document, to support development of 395 new houses in Horsley, of which 295 will be within West Horsley. Additionally, I oppose the removal of the village areas within the boundaries from the protection of the Green Belt. Whilst the scale of development has been reduced somewhat since the previous 2016 Draft Local Plan, I still believe that the proposals are extremely misguided, and would be highly damaging to the existing community of East and West Horsley. In addition, they are strongly opposed by the residents of the area. The small changes to the draft plan do not alter my fundamental objection to key elements of the plan. I have lived in West Horsley since 2009 and intend to be a long term resident, and therefore am deeply concerned about the proposals set out in the draft plan. I am also a Chartered Surveyor with 16 years of experience and so have a clear professional understanding of the issues involved. My objections are as follows. Overall Level of Housing Development proposed for Guildford Borough. I object to overall level and type of housing development which is proposed for the Borough. I have seen no clear rationale for the considerable growth projections which underpin the housing calculations. The revised proposals show a modest reduction in new homes per annum compared with the 2016 draft plan, but to a level of 654 homes which is almost identical to what was originally proposed in 2014. The overall housing growth figures suggested are close to double the Office for National Statistics prediction for the growth of Guildford. Generally, I feel that far too many of the proposed development sites are located within the Metropolitan Green Belt. This will have a damaging effect on the quality of life across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We have to believe there are insufficient homes and therefore we have to believe homes are required. We have to believe the number of homes needed. It is important to choose carefully where these homes are to be built - either as tagged on to existing or create new home areas. It is important to provide the correct design of easy to maintain homes - which the young can afford to purchase or rent. It is important to build on land which is Surface Water Managed and suitable highway/transport provided - i.e. Highway speed controlled, ample traffic filtering (traffic lights) and adequate parking facilities. It is important to provide reasonable space for each dwelling for healthy living - i.e. do not over-develop with density of build. There are dwellings and land in a neglected state that could be redeveloped into affordable flats/first time buys.
There are roads/junctions that could be redesigned to filter traffic/ease congestion. There are businesses that could be moved so to provide parking. The impact on our highways needs some forethought with changes before development, rather than deal with gridlock. So much time is wasted now due to congestion and the lack of traffic control/filtering. Facilities such as wastewater treatment should be put in place before demand is increased.

We cannot afford sustainability now due to the lack of funds. We are having to accept low standards now - how long can this be tolerated?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:**  PSLPP16/12528  **Respondent:** 8769793 / Laura Richards  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY S2**

I O B J E C T to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging...
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5063  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4885  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

---

Page 171 of 1722
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5580  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

---

Section page number 173 of 1722  Document page number 874
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16689  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1914</th>
<th>Respondent: 8773313 / Susie Harkness</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed number of 693 houses per year which is far too high and double the figure used in previous plans.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12857</th>
<th>Respondent: 8773377 / Anthony &amp; Anne Bond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I wish to register a strong objection to the proposal that Guildford add an astonishing 13,860 new homes accompanied by a 40% increase in retail space</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12861</th>
<th>Respondent: 8773377 / Anthony &amp; Anne Bond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The plan that you are proposing will completely ruin the nature of Guildford, so I suggest that you reconsider</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<p>| Comment ID: PSLPP16/14452 | Respondent: 8773377 / Anthony &amp; Anne Bond | Agent: |</p>
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>the need for expansion appears flawed and, in the light of Brexit, surely needs to be seriously re-examined</td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/14455  Respondent: 8773377 / Anthony & Anne Bond  Agent: |
|---------------------------|---------------------------------------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| | protecting the character of Guildford and the surrounding area is the biggest responsibility of the Borough Council. You owe it to future generations to address the needs of the people in a balanced and coherent manner. This plan needs revisiting! |
| | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/12123  Respondent: 8773409 / G B Lovegrove  Agent: |
|---------------------------|---------------------------------------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| | There are several other aspects that show this Draft Local Plan to be ridiculous, bordering on reprehensible destruction |
| | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/6413  Respondent: 8773953 / Robin Garnett  Agent: |
|---------------------------|---------------------------------------------------------------|
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
I object to this policy. The presumption of 13,860 new homes required by 2033 is unsubstantiated and highly unlikely in view of the Brexit decision which is likely to reduce economic growth and the demand for housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8392  
Respondent: 8774369 / Gary Cooper  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the overall strategy.

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/629  
Respondent: 8775169 / Shaun Cheyne  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17134  
Respondent: 8775201 / Nick Harrison  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The number of homes (SHMA) to be built according to the plan is nearly 14,000 (690 per year for the duration of the plan). This excludes any permissions that have already been granted, as well as windfall sites.

I object for a number of reasons:

1. There is no justification of the figure whatsoever
2. The growth is too high
3. Guildford Borough Council has not applied any constraints to this figure to allow for the lack of appropriate infrastructure or to protect our countryside from development.
4. This number is resulting in Guildford Borough Council encroaching into the Greenbelt without special circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6161  
Respondent: 8776321 / Cath Cuin  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My overriding concern is that at the unacceptably high level of expansion. Why are constraints to the overall housing target not being applied so as to protect the character of Guildford? The severe levels of traffic congestion, insufficient parking in Guildford town and pressures on services are already causing problems and strains without the addition of such an extreme number of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6162  
Respondent: 8776321 / Cath Cuin  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I find it unacceptable that unlike other towns and areas, Guildford is not choosing to constrain its overall housing growth. Roads such as the A25/A246 Epsom Road, the A25 Boxgrove Road, A3100 London Road and A25 Ladymead are congested and at a standstill on an almost daily basis. The pressure of so many new homes outside the centre of the town will make this unbearable even with the highway schemes in the Plan. Please can a reduced and more realistic housing target be set.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17020  
Respondent: 8787969 / K Britton  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I find it unacceptable that unlike other towns and areas, Guildford is not choosing to constrain its overall housing growth. Roads such as the A25/A246 Epsom Road, the A25 Boxgrove Road, A3100 London Road and A25 Ladymead are congested and at a standstill on an almost daily basis. The pressure of so many new homes outside the centre of the town will make this unbearable even with the highway schemes in the Plan. Please can a reduced and more realistic housing target be set.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) does the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the Guildford Residents Association response and oppose the expansion of Guildford.

I do not agree that there is an inherent need for so many additional homes, as I said in my earlier feedback.

The demand for homes is due to Guildford being a desirable place to live, and I wish to keep it that way. 25% increase will not keep it that way, will not protect the character of the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/766  Respondent: 8790529 / Nigel Carter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The scale of the development will alter the character of Horsley and it will no longer be a village but a town, but unable to cope.

1. Any development in this area could set a precedent for the whole of Green Belt Land and render the principle meaningless.

1. Guildford BC should consider other brownfield sites, and sites within existing towns, rather than villages, where infrastructure, transport and communications can more easily cope.

1. Finally there is little or no mention of the One Public Estate initiative backed by the Cabinet Office. This initiative seeks to aid Local Authorities to make more efficient use of its buildings and land. It aims to increase efficiencies, reduce footprint and release surplus land and buildings back to the community for housing. Guildford Council needs to explore this potential before pushing forward with any changes to the Green Belt.

For these reasons, I urge the Council to maintain the Green Belt status and retain the current boundaries, and reject this proposed development plan, and re-examine the options outside of Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1042  Respondent: 8791393 / B C Howe  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have lived with my parents in Horsley for number of years and I write to object to the revisions to the new local plan and taking the Horsley out of the Green Belt. I note that with the amended 2017 plan that four of the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. The evidence that exists is exaggerating the need for expansion as shown clearly by the GRA report on housing.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/103  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.0 Strategic

1.1. Policy S2: Borough Wide Strategy

1.2. Policy S2 sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Local Plan, equating to an annual build of 693 new homes per annum.

1.3. I have concerns about the enormous scale of this building program, represents, as already mentions above a net 25% increase in the housing stock of Guildford Borough, a remarkable rate of increase even for a borough in the English Home Counties. This is against a background projection of the Office of National Statistics (“ONS”) of a population growth of only 15% for Guildford Borough over this same period.

1.4. Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DLCG”) are predicting Guildford actually requires. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

1.5. Economic growth is already factored into the statistics produced by ONS and DLCG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough.

1.6. Furthermore, DLCG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, effectively it would mean that Guildford Borough would see its population rise by around 25% over this period. This would mean that the actual population growth rate for Guildford Borough would actually come out at a level that is 67% above official forecasts.

1.7. Another concerns in reviewing the Local Plan is that the impression is conveyed to the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements, or because of central government policy – in other words that GBC has no real choice but to put forward these expansionists projections, unpalatable though they might be because they are being forced to do so. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of massive civic and economic expansion – one might perhaps term it a policy of ‘Imposed Growth’ – in order to underpin all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a choice made by GBC for which it has no mandate.

1.8. The SHMA set out to establish the objectively assessed need and guidance from DLCG was that it was not just another ‘needs survey’ but it was to look at market and affordable need. I will come back to this point in relation to
affordable housing in a separate item. The other key point set out by DCLG was that in undertaking the assessment they were to ignore any constraints like Greenbelt, AONB, land availability and land cost etc. The idea was to get the best information on need LA were then expected to take into account matters of constraint in determining the number to go forward with in their Local Plans

1.9. There is no indication in the "Proposed Submission Local Plan" that they have taken any note of the constraints of the Greenbelt, land availability in fact they have added to the numbers in total disregard to their undertaking to protect at all cost the Greenbelt. The Expansionist Growth policy of the GBC and it proposals in this policy documents were not made clearly and explicitly to majority at the election.

1.10. I therefore OBJECT to the Expansionist Growth Policy and to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3288</th>
<th>Respondent:</th>
<th>8792193 / Brian Wolfe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the borough housing targets set out in Policy S2.

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes, a reduction from 13,860 homes proposed an annualised figure of 654 dwellings per annum a reduction of only 5.6% because of the different time periods considered by the revised plan.

I consider this revised target for the borough housing target as still very high and should be reduced significantly further.

The main reasons for this are set out below:

The conclusions drawn from the revised SHMA are seriously flawed. The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 ['SHMA Addendum'] issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. [This was in itself also flawed]. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in economic growth, population trends, and migration patterns requiring a far more cautious approach than that currently put forward in the revised Local Plan.

**Justification for objection**

GL Hearn presented four alternative scenarios for their models, based upon different assumptions on the population projections. Their four scenarios resulted in projections of overall growth of Guildford borough housing needs over the plan period based on demographic trends of between 10.4% and 15.3% dependent upon the scenario used. Whilst the lowest of the figures, 10.4%, uses projections based upon a 10 year migration trend and making an UPC adjustment as proposed by the ONS in order to take account of various statistical anomalies in sampling sizes, etc. This growth of 10.4% provides a housing need for Guildford borough estimated at 521 dwellings per annum. GL Hearn recommends that GBC adopt the higher end figure of their scenarios, but no reasoning is given for this assumption this has resulted in a proposed, and now questionable ‘demographically-based’ housing need of 559 dwellings per annum, this figure is used as the base figure in the Local Plan.

GL Hearn [as in their 2016 SHMA report], proceeded to raise this figure further with a series of adjustments to reflect higher levels of projected **economic growth**, additional **student housing** and also an adjustment for **affordable housing**.
In my earlier comments to GBC, I was critical of this approach, pointing out this is highly speculative, as these factors of economic growth are already included within the household growth projections put forward by the Department of Communities & Local Government. Whilst GL Hearn have made some minimal adjustment to their tuning of economic growth in projections of housing need, possibly to adjust for Brexit. They are still effectively double counting. They have increased their proposed overall housing need figure to 654 dwellings per annum, an increase of 95 dwelling above their own top end demographic trend figure. Whilst it is acceptable for adjustments to be made to the base SHMA. I make the following observations and would challenge their weak arguments

**Affordability** GL Hearn in the SHMA notes that housing in Guildford is significantly less affordable than in England as a whole and therefore made an adjustment for extra homes each year to reflect this. However, the Government’s Planning Practice Guidance [PPG] notes say that, “Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.” The issue here being, is not whether prices are high but whether that they are rising faster than elsewhere. The data for the affordability of homes in Guildford relative to earnings suggests that it is no worse than other parts of Surrey and it has not seen a faster deterioration than in other boroughs in Surrey. There are some that have seen a worse deterioration. By increasing housing supply beyond the level suggested by the demographic OAN would not result in any noticeable improvement in affordability but simply in more people who can afford high prices homes moving to the area. On this basis affordability uplift for Guildford would not be justified.

**Students** The other reason GL Hearn felt warranted an upward adjustment was to increase the provision for student housing. However, extra student homes are already included in the official projections and at a level that is possibly more than will be needed. There is evidence in the SNPP of a significant upward blip at age [18/19] that the student age group in Guildford has distorted the population projections and this distortion has fed through into the DCLG household projections. Given that there are reasons to believe that the SHMA’s calculation may overestimate the homes needed for students, there is not a case for adding additional student housing. Indeed, there is a possibility that the adjustment for students should be negative, not positive i.e. that too many student households have been included in the projections. This analysis of the impact of potential increases in student numbers may have on the overall housing needs of Guildford is complex and I guess would be best carried out separately from a general demographic analysis that has been used.

**Economic Growth** GL Hearn’s analysis is an adjusted projected housing need of 654 homes per annum, which if built would represent an overall increase of 22% in the housing stock of the borough. This compares to the ONS projection of 521 homes 10.4% GBC in their Local Plan are therefore proposing a housing figure which is more than twice this level of projected population growth. The final nail in the coffin of these projections by GL Hearn whilst acknowledging the influence of UPC when they used the latest 2014 Sub-national Population Projections they did not identify and take into account any Unattributable Population Change UPC which has been estimated to reduce the final number by up to 80 units.

Now is not the time to be double a commitment to future growth. GBC have chosen to adopt the highest forecasts on offer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3289</th>
<th>Respondent:</th>
<th>8792193 / Brian Wolfe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. **Policy S2 Local plan housing Target & SHMA**

**Further justification for objection**

**Are the processes used correct?**

- Strategic Housing Market Assessments [SHMA] are relatively new in that it looks at the needs for all tenures of housing as opposed to the earlier Housing Needs Assessment which only looked at Social Housing Need.
- Guidance given to Plan Makers made it clear that the SHMA needed to be an objective assessment of need based on facts and unbiased evidence. That Plan Makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, greenbelt, historic under performance, infrastructure or environmental constraints.
- It went on to state that these considerations will need to be addressed when bringing the evidence bases together to identify specific policies within the development plans. i.e. the housing policy targets. So GBC are supposed to take the SHMA and then set it against any constraints that apply within the borough.
- GBC have failed to make or document any adjustments to accommodate for planning constraints, in particularly, the Green Belt, supply of land, AONB and flooding etc. The housing need projections of GL Hearn have been taken by GBC directly as the housing targets figure for the Local Plan.
- They therefore fail to take into account any of the significant and relevant constraints which do limit the supply of housing land across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt.
- We find nevertheless that over 58% of proposed development plan proposes to build on Greenbelt Land. That does not include areas in villages inset from the greenbelt that will be open to greater infill and wind fold type development.
- They have also failed to allow for limitation imposed by the already overstretched infrastructure including transport issues by using inappropriate and discredited transport assessments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7874</th>
<th>Respondent: 8792545 / Surrey Chambers of Commerce (Louise Punter)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Surrey Chambers has supported the Borough throughout the process of securing a sound plan. This note is to extend that support by writing to again to re-enforce the Chamber's support for the current pre submission plan in its final Section 19 consultation. Guildford is an important town in Surrey, termed a growth town by the EMj LEP, where the University of Surrey and its Park are located that are an important part of the economy. The Borough needs to secure an adopted plan to enable its business community to continue to have a clear planning landscape to ensure that they can lay down investment plans. I am writing on behalf of the Chamber to add to our existing support for the Borough in delivery of its plan. In specific terms, this support is for:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Planning the provision of 13,680 houses across a range of tariffs and tenures</td>
<td></td>
</tr>
</tbody>
</table>

---

**Page 186 of 1722**

---

**Document page number**

887
• Improvement of the transport infrastructure in the town
• Help in supporting the educational base in the town
• Provision of additional land for the growth of employment
• Recognition of the importance of the employment base in the Borough which needs support if its strategic role is to be met fully

A plan which
• Meets national planning policy
• Has been subject to intense scrutiny
• Has the support of the elected members of the council
• It is important to put in place a sound plan that can be used by the community at large, organisations such as the LEP and by business themselves to support further investment in the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16492  Respondent: 8794753 / Andrew Beckett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build...
homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.
The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16564  Respondent: 8795329 / Nicholas Williams  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object due to poor quality air concerns. The enormous developments will further pollute the air and be detrimental to the health of the local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1437  Respondent: 8795553 / Robert Taylor  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to give my comments on the Proposed Submission Local Plan, issued June 2016, as a part of GBC’s consultation process.

I OBJECT to the Local Plan overall. My reasons are that the housing targets proposed for Guildford Borough are much too high. In my opinion they represent an overly aggressive plan that has no real foundation. The supporting analyses given as justification for these proposals are seriously flawed. Moreover, I do not believe that the proposed policy of aggressive expansion in Guildford Borough's housing stock is supported by a majority of its residents.

My objections to specific policies within the Local Plan are detailed below:
Policy S2: I OBJECT to the Borough wide housing target which is set out in this policy. The ONS population growth projections for Guildford Borough are for a 15% growth over the plan period but GBC proposes a 25% growth in its housing stock. This is unjustified. It also completely fails to take into account the constraints of the Green Belt which prevents such expansion from taking place other than by the wholesale consumption of Green Belt land. GBC justify their additional housing proposal based upon the need to support the high levels of economic growth expected in the Borough, on the need to house more students and on the need for more affordable housing. Firstly, economic growth at official projections is already included in the ONS population projects; secondly, there is ample affordable housing proposed in GBC's affordable housing policy; thirdly, following the Brexit vote it is clear that official government population and household projections will need to be seriously reduced, as will official economic forecasts, nationally and within the borough. GBC should either withdraw its Local Plan proposal entirely in the face of this important new factor, or else it should make its own estimates for the reduction needed to take account of the Brexit factor. My suggestion would be to cut the Borough's housing target by 50% from that indicated in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/463  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 Borough wide strategy

The housing targets for the borough set out in the plan are still much too high, despite the small reduction of 5.6% made in the annual housing target in the revised plan. The SHMA which underpins this target number is seriously flawed and fails to give due recognition to the impact of Brexit on future population forecasts. Despite considering a range of different methods for assessing future forecasts the SHMA study by GL Hearn dismisses the more conservative ONS projection based on a 10 year population trend analysis, (one which gives a projected population increase of 10.4% over the plan period), and makes a series of unjustifiable adjustments above the demographically-derived projection. This results in a proposed housing target which would see an increase of 22% in the overall housing stock of the borough. This increase is more than double the ONS population growth forecast. Given the strong likelihood that following Brexit the population growth will be further reduced this proposed target is not justifiable.

In my opinion the high housing targets proposed appear to reflect the political objectives of certain officers in GBC, more than the needs of Guildford borough residents or the views of over 30,000 residents who have registered their previous opposition to the target housing numbers proposed in the previous local plan.

The scale and locations proposed for new housing also fail to take into account the many constraints on development across the borough, in particular the major impact of Green Belt restrictions and the inadequacies of borough infrastructure.

For the reasons above therefore: I OBJECT TO THE HOUSING TARGETS SET IN POLICY S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3376  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Objections to the Guildford 2016 Local Plan

I am currently overseas so am writing to you by email in respect of the above. Accordingly this letter will not be hand signed.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openess of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/684  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis on providing retail and commercial space in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.
I object to the fact that in Policy S2, despite the afore-mentioned slight apparent reduction in overall housing numbers and industrial space; the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1476  Respondent: 8796481 / Sally Erhardt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the excessive number of houses to be built in this part of the borough. The Green belt is not up for grabs. Ripley has built well over its fair share of houses already. The urban areas of the borough should be able to produce space for housing in the same way as Ripley has done in the last few years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1477  Respondent: 8796481 / Sally Erhardt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the impact of the plan on transport, local roads and road safety. Ripley is already over congested and at rush hours often at a standstill. The A3 must be near full capacity already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/830  Respondent: 8796481 / Sally Erhardt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the unfair burden on the North East of the borough for this development. The new plan has become even more unbalanced toward the North East of the Borough – why is 40.6% of the homes proposed within 3 miles of Send Marsh? This area has already had its fair share of development and it is very unfair that this region should face most of the development and the extended development proposed by the new plan.
I object to the concealment of development through ‘deferment’ at sites A24, A25, A26, A43. This deferment is designed to hide the number of houses being built. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2972  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3805  Respondent: 8796705 / Mandy Pye  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to OBJECT most strongly to the new revised Guildford Local Plan, in particular to the Policies that affect West Horsley, but also to those in East Horsley and all the villages that the Local Plan has proposed to remove from the Green Belt. Most land in our borough no longer appears to be safe and designating various areas as Green Belt, SSSI's or for any other type of conservation seems to count for nothing. The proposed number of houses the Guildford Borough Council wishes to build in our villages will change the villages that their residents know and love. The proposal is for an overall increase of 36% in the number of houses in West Horsley alone and there's a distinct feeling that West and East Horsley have been 'allocated rather more than their fair share' compared to other areas of the borough. It has even been proposed that our local facilities such as the Horsley Tennis and Cricket Club and the East Horsley Kingston Meadows, which also has tennis courts, could possibly be considered for development. These are places that are a huge asset to the people who live in the Horsleys and are an integral part of village life which are enjoyed by many. The open spaces we have within our villages are a part of what makes our villages a special place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7543  Respondent: 8798849 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2729  Respondent: 8798881 / H L Cousins  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/12740  **Respondent:** 8800545 / Bill Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards in light of the Brexit decision. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey".

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has to date failed to revisit the data to validate that it is correct despite overwhelming concerns raised by borough residents. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need", Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done? The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.
Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1758  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Lastly I object to the significant amount of development that has been suggested for one area of the Borough. I wonder whether this is the result of a Conservative majority deciding to make the residents of Send and Ripley suffer as a result of their rejection of the Conservative candidates at the last Borough election, and I say that as a member of the Conservative Party.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15384  Respondent: 8801665 / Charlotte Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I am extremely concerned about the amount of new housing proposed and the infringements onto the current Green Belt, which will result in a significant increase in traffic and pollution in the area and the road through West Clandon becoming even busier and resulting in traffic accidents, more injuries and deaths. I attach two photographs taken in the last year which demonstrate very clearly how narrow the A247 is in parts – one is taken outside Summers and the other outside the Clandon Village school. In both cases lorries have mounted the pavement to pass each other - no further explanation needed. Increased housing will increase the amount of lorries passing through the village and on completion an increase in traffic in general.

Once the green spaces are taken, they can never be brought back and our country will forever be poorer and a less pleasant place to live.
I do not understand why the government cannot encourage more development and extra housing outside of the South East of England to 'spread the load' and discourage more and more people wanting to come to London and the South East. This should also ease the price and affordability of housing in the South East.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Guildford borough Proposed Submission Local Plan: strategy and sites, June 2016

As a resident of West Horsley, I am writing to object to the Guildford Borough Proposed Submission Local Plan

I reject and object to many parts of the Plan. Much is based on flawed evidence and inadequate consultation with local people. More than 20,000 responses to the previous draft Local Plan in 2014 were opposed to many of its proposals, yet GBC has made relatively few changes, and certainly none of any consequence. Its aggressive and unjustified target of increasing housing stock by 25% would create an intolerable strain on both land and infrastructure in this already congested part of the country, and its assertion in Policy P2 that “We will continue to protect the Metropolitan Green Belt” is frankly laughable in light of its proposals for insetting and settlement boundary changes proposed for so many of its rural villages. The reality seems to be that it is adopting an implicit forced growth policy for the Borough – one that is not supported by the majority of its electorate

I object to the borough housing targets set out in Policy S2

The predicted population increase is unsubstantiated: it is in excess of Government ONS forecasts. Policy S2 states that provision will be made for 13,800 new homes between 2013 and 2033. The number of homes is too high and unsustainable in Guildford’s villages. The target outlined represents a 25% increase in the housing stock of the borough, while ONS projects a population increase of some 15% for Guildford Borough over this same period. And in light of the Brexit vote, GBC’s predictions are possibly even more questionable. I agree with East Horsley Parish Council’s very reasoned analysis of how and why GBC has come to such an over-inflated target for housing growth in its response to the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the development of 385 homes on the 4 proposed sites in West Horsley set out in Policies S1: Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes

The need for so many houses to be built in West Horsley and at much higher densities than currently exist in the village over the first 5 years of the Plan period is totally unproven

The expansion of West Horsley with the proposed high volumes of new housing development is unsustainable in terms of provision of school places and medical services, drainage, road capacity, public transport, shops, and parking for essential services (especially in East Horsley for shops, the library and the station)

The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified only a limited need for some 20 affordable homes for local people who want to remain in the village (for young people and for elderly people who wish downsize to a smaller home)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14434  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2

I object because:

- Concerns about the Plan’s predicted increase in population and housing needs have been raised since 2014, but the Council has chosen not to seek better data
- The population and housing needs numbers are based on pre-Brexit projections, so probably need to be revised downwards, possibly quite dramatically

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5078  Respondent: 8802369 / Penny Panman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2: I object to the enormous scale of the proposed building plan. The Office for National Statistics and the Department of Communities and Local Government predict that, based on their population and household forecasts, 517 homes per annum will be required. But the Strategic Housing Market Assessment has for some reason added another 120 homes per annum in order to ‘support economic growth’, 31 to ‘improve affordability’ and 25 due to ‘student growth’ which brings the total up to 693 homes per annum. Guildford Borough Council tries to blame central government policy for the housing targets, but I believe they are actually due to GBC’s own aggressive policy of civic and economic expansion. This is a political choice made by GBC without being honestly or transparently explained and I do not believe it is supported by the majority of the electorate. Doubt has consistently been thrown on GL Hearn’s methodology in reaching the 693 homes per annum, and this has been reinforced by Councillor David Reeve's and another independent source's recent exhaustive research and mathematical modelling. The whole draft local plan is being built on shaky foundations. We deserve better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5081  Respondent: 8802369 / Penny Panman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To summarise: despite Guildford Borough Council's promise that they have listened to local concerns about the previous draft local plan, I believe they have continued to tread exactly the same path as before, except that they have proposed an even greater number of homes while refusing to share the methodology behind reaching this number and they have taken even more land out of the Green Belt. Yet again the electorate is being treated with contempt. I object to this draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13836  Respondent: 8803713 / Ian Berry  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that East and West Horsley seem to be ‘targeted’ for development. There are much more logical sites in the borough where development could be sustained by existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3563  Respondent: 8804897 / Alan Goodfellow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the volume of housing proposed in the Local Plan for the Horsleys, currently standing at 533 on the main sites proposed plus a further 90 on other small sites. This scale of development cannot be sustained without major infrastructure changes and improvements. Currently our roads (which are mainly country lanes) are choked with traffic, parking at the shops is impossible, parking at the station is only just sufficient, it is very difficult to obtain an appointment at the surgery and the schools are already full to overflowing. “With a further 500 plus families life would be impossible and that is without the development at Wisley. Should all this volume of development be done then the area would become an urbanised area. Do we want to leave this as a legacy for future generations or do we want to leave the pleasant green land that we have known and enjoyed ourselves?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4101  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/420  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes.

However I believe this revised target for borough housing is still excessively high and should be reduced much further. This is due to the following:

a) The conclusions of the revised SHMA are seriously flawed

The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 (‘SHMA Addendum’) issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in population trends, migration patterns and the economic development of the UK.

b) GBC fails to make any allowance for planning constraints, particularly the Green Belt
The housing need projections of GL Hearn are taken by GBC directly as the housing targets proposed in the Local Plan. They therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt. They also fail to allow for the already overstretched infrastructure.

Other local plans across the country have adjusted their housing targets to reflect such constraints. However, GBC chooses to ignore them. This is despite having a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”.

In order to meet its high housing targets, GBC proposes to remove large swathes of land from the Green Belt for use as housing. This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land. This is achieved because the Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries without due justification in order to deliver land for housing use in the Local Plan. The many apparent justifications given by Pegasus in their Green Belt & Countryside Study are extraordinarily weak and in many cases fail to meet the planning criteria required for moving long established defensible Green Belt boundaries. In East Horsley this applies to the Green Belt movement proposed at Kingston Meadow (a movement away from a river line) and at Lollesworth Fields, as discussed further in Section 2 below.

The majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt. Indeed the Guildford Green Belt group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt.

A further concern is the fact that the Green Belt land selected by GBC in the local plan is predominantly located in the north eastern part of the borough. Therefore it is land closest to London, which represents that most vital part of the Green Belt needed to prevent the encroachment of the Metropolitan conurbation.

Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue – there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan now proposed by GBC it seems that these voices have once again been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

3. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

4. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

5. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is a major difference between the borough wide housing delivery strategy given here (in Policy S2) and that given in the LAA. Why? In the LAA, housing delivery in the first five years of the plan is given as 3,288 dwellings, plus a further 1,342 from outstanding permissions, a total of 4,630 over the first 5 years of the plan. Yet in the S2 Policy Statement above, the total is only 2,950, a difference of 1,680 dwellings over 5 years, an average of 336 dwellings per year over these five years. Which is correct? Why is there such a difference between documents, so much confusion? Given this confusion, why should I have faith in any of the documents produced or endorsed by GBC?

The simple truth is that housing need in the SHMA was grossly inflated. This local plan is supposed to provide housing for local residents - but how can this be so? Over the period of the plan, (if implemented) based on the average dwelling occupancy in the last census, the population of Guildford will increase at 4.5 times the rate seen between the two most recent censuses of 2001 and 2011. How could this housing be for local residents? Has there been an explosion in the local birth rate? Does the water supply of Guildford include an additive to ensure the delivery of triplets on every conceivable occasion? The answer to these questions is no - and so this is not a plan for local residents. This means the plan is legally non-compliant, Local plans are supposed to be for local residents. This plan is not.

This section of the plan is not sound, as it is clear the housing need has been grossly inflated. Not only has the housing need been exaggerated, but so too has the need for employees to feed the local economy, which is predicted to grow at a rate not seen in living memory. According to this, there will be boom but no busts, just a long continuous boom - a dream that even Gordon Brown in his most evangelical trance dared not enunciate. GBC have done what Gordon Brown failed to do - they have abolished busts, and so Guildford's economy will grow, grow, grow - for 15 solid years. What a fantasy. The AECOM report on Guildford's economy propagated such a vision, sadly wholly false. It is astonishing to suggest, as the draft Local Plan does, that jobs can be created each and every year over a 15 year period at a rate never seen by Guildford in its past. The housing target of a minimum of 693 dwellings/yr will mean that there will be about an additional 1200 employees available per year - each and every year. Guildford would have to supply an additional 18,000 jobs over a 15 year period. To justify this, AECOM produced a report that included a selective use of statistics, used averaging when it was totally inappropriate, and had very limited ambition when it came to land use efficiency. But the best that they could suggest for GBC with regard to land use efficiency was that they should match the average land use efficiency of the country - in an area where land costs are high and green belt was 89% of the borough. Greater ambition would have been much more appropriate. So the section of the report that deals with the need for employment floor space is no better than the SHMA, or the Green Belt and Countryside Study. Any plan based on these documents could not be sound.

Supposedly, in meeting their duty to co-operate, GBC have engaged with two other local authorities. Yet 6 local authorities share a boundary with GBC. How can a housing report shared with 2 others adequately reflect the reality of the local housing market? The duty to co-operate has been glossed over.

Another reason for my objection is that this plan will do nothing for those dependent on social housing. It is fixated on home ownership, despite this not being a suitable option for a large percentage of the population. At the home ownership peak, locally, about 25% of homes were rented. Since then, wage rates have declined in real terms, and now, nationally, about 35% of residents rent. There is nothing in this plan for those whose only realistic option is to rent, whatever their circumstances or ambition. There is a need for a substantial expansion of social housing, but this is not recognised in this plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2266  **Respondent:** 8806849 / Roland McKinney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
2.1. Policy S2: Planning for the Borough
I object to this policy. Specifically, I object to the housing target of 12,426 as this has been developed using a model that uses assumptions that have not been made public. Essentially the model uses population statistics that are developed over a 5-year period, but these are projected forward to 2034. Population statistics should not be used in this way unless accompanied by an analysis of underlying factors that could cause changes to current population trends. Factors such as changes in death rates or changes in immigration levels have not been considered. A more thorough analysis was performed by Neil MacDonald of NMSS and his conclusion was that a lower housing target would be appropriate for the borough.

2.2. Policy H1 (and H13): Homes For All
I object to policy H1 as it fails to adequately consider the provision of social housing which is desperately needed. A paragraph (4.2.8) that considered housing density has been deleted from the previous iteration of the draft plan, but densification of housing within Guildford town is an alternative to building on Green Belt sites. Lord Rodgers and many other planners make cogent arguments for the densification of towns and cities, but these have been ignored. It is essential that land is used efficiently, especially previously developed land. A further objection is to the housing target for students – one objective should be to provide accommodation on the campus for all first-year students as well as for at least 60% of other students. This would make more housing available within the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3621  Respondent: 8808321 / Ian Peacock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5620  Respondent: 8809441 / Cameron Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, an area that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5621  Respondent: 8809441 / Cameron Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5061  Respondent: 8810017 / Alison White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the Guildford Plan Planning Policy (Local Plan Consultation) The huge number of homes proposed takes insufficient account of major transport and infrastructure problems. The numbers used are far too high as evidenced by the data gathered and published by the Guildford Residents Association. Evidence gathered prior to ‘Brexit which should also be factored shows the figure for new home should be 510 per year from 2013 to 2033.

Guildford Borough Council needs to be transparent about the calculations used to produce their figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5266  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing coalescence of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
If each village across the south had an additional 10 house built would this not rectify the need for more housing? Rather than ruining the peace & tranquility of villages why not try & enhance them. Don't build on Greenbelt land. There are no exceptional reasons to do so within the Horsleys or surrounding area for that matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/971</th>
<th>Respondent:</th>
<th>8810657 / Mike Peters</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT in the strongest possible terms to the above plan. As a retired person I do not have the facilities or the resources to enter into every aspect of this plan. But I particularly OBJECT to those sections listed below appertaining to the area of West Horsley and the adjacent areas proposals.

I OBJECT in detail and in general to this plan

I particularly OBJECT to the method whereby this plan has regurgitated inaccurate, badly researched and unjustified information and is an obvious ploy to get around the previous objections voiced within West Horsley and, indeed, in all the villages affected.

I OBJECT to being forced to undertake this exercise again and that my previous OBJECTIONS have been put aside. This cannot be democratic.

I OBJECT to Policy Q: Green Belt and the Countryside: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I am totally opposed to the plan affecting all the Guildford Villages and to West Horsley’s removal from the Green Belt by insetting and extending the 2003 boundaries. There are no exceptional circumstances or other justification for the new Green Belt boundaries that will result from the proposed insetting. This study is flawed.

The West Horsley Parish is well established with low housing density settlements with a considerable number of historic buildings and the Council fails to make a case for locating large numbers of homes in the Horsley or neighbouring villages.

I OBJECT to the Polices S1 Presumption in favour of Sustainable Development, Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes.

No accurate or acceptable case has been made for provision for 13,800 new homes over the period 2013 to 2033. The number of homes is too high and unsustainable in Guildford's villages. The current infrastructure is strained and at breaking point and there are no plans for addressing the infrastructure

The proposals for West Horsley are clearly unsustainable for the proposed high volumes of new housing development

I OBJECT to the development of 385 homes on the proposed sites in West Horsley. The proposals are at much higher densities than currently in the village and with the existing mix of different housing styles and the layout of the village.
I OBJECT particularly to the proposals for site A40 in that this is the area I know best. The A40 site is unsuitable for development and the Guildford Council has several times rejected applications to build on the site. It has a high water table, is prone to flooding in even medium rain fall and in high rainfall there are problems with flooding of the roads and the overflow of sewage. The work to make such a site suitable for development, even for a third of the homes specified would be out of proportion to any return on capital invested.

The drainage affects are acknowledged by the water authorities who point out that the downstream effects are sizeable and probably uneconomic.

Importantly this is an area of calm, peace and quiet within the green belt and I am reliably informed that there are several species of orchids growing and the land is full of wild life which needs preservation.

The development proposals throughout the village- and also in terms of the knock on effect of the Wisely Airfield proposals- are unsustainable in terms of schooling, drainage, roads capacity, shopping and Rail Station parking, and lack of public transport.

The roads are already at capacity and breaking up under the strain. Traffic uses Ockham Road North as a cut through/rat run when the A3 and M25 are busy or blocked (frequently these days) and this is acknowledged by Surrey County Council roads authority.

There is a major strain on schooling in the area and on medical services. There are few jobs in the area and the practicalities of commuting to London or, indeed to Guildford are heavily affected by the plan.

The strain on the current rail service is obvious and it all but impossible to park at the Horsley rail Station where the parking even after extension work is problematical.

I OBJECT on the grounds that there is no proven need for so many houses to be built in Horsley. It is totally unproven and risks the formation of a dormitory township devoid of infrastructure that could manage such an influx of people and cars.

Any forecast of housing needs is also rendered out of date by the current Referendum related to immigration which will lead to a much lower demand for housing in the future

It is my understanding that in West Horsley the recent survey of the village in 2014, identified a limited need for only 20 affordable homes.

In summary: Guildford Council’s plans are highly suspect and need investigating in depth. Inquiries should be made into the reasons for the document which, for example, must have been completed before the democratic decision, widely applauded, to refuse planning for the Wiseley Airfield site proposal. Yet this proposal appeared again in the council’s plan. The allocation of developments to the various villages are dubious.

Why build on the Green Belt when there is room and land for development within the immediate area of the town of Guildford where it is likely there could be an increased demand.

The National Planning Policy Framework requires that new residential development must respect the character and density of housing in any areas and be limited in quantity by the availability of infrastructure and local facilities.

I couple with that the need and the desire of the people of the area to preserve the GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guiford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across ‘Surrey’s’ 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16584</th>
<th>Respondent: 8813281 / P J Ryan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in our area of the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9867</th>
<th>Respondent: 8813505 / Peter Grimble</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
<tr>
<td>Should the Plan be adopted West Horsley would increase by some 35%. a figure greater than any other single area in the Borough. If it is inevitable more houses are to built, GBC is urged to ensure a fair and equitable spread of this development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2744</th>
<th>Respondent: 8813601 / Gaenor Richards</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
As a long term resident of West Clandon, a village in which my children have grown up, and my grandchildren are now growing up, I have given this issue considerable thought. As a result, please find below my objections to Guildford Borough Proposed Submission Local Plan (June 2016).

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016) overall. This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

Furthermore, I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

1. I OBJECT to the Borough Wide Strategy

A - The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

B - The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite significantly.

C - The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverly. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on
open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (AZS) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. This will result in undesired coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages and a permanently detrimental impact on each of these currently distinct communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Your papers also contain comments on the type of housing that you would wish to see in the Horsleys. Here again your approach is flawed as 533 new homes of the type you describe would be wholly out of keeping with the village. It is an observable fact that many Horsley houses are large and on large plots and that is why people have bought them. Furthermore, you reflect this fact in the heavy Council tax bills we pay from which Horsley residents derive few benefits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10221</th>
<th><strong>Respondent:</strong> 8817121 / Celia Howard</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17078</th>
<th><strong>Respondent:</strong> 8817377 / Mark Silcock</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4014</th>
<th><strong>Respondent:</strong> 8817537 / Kim Meredith</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

---
I object to over 70% of new housing proposed to be built within the Guildford Borough. There are ample brownfield sites in the urban areas which could be used first before looking elsewhere.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4026</th>
<th>Respondent:</th>
<th>8817537 / Kim Meredith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object that the National government guideline has not been conformed to as it states that development must be proportional to its locality – which is not the case here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6532</th>
<th>Respondent:</th>
<th>8817569 / Peter Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am a resident of East Horsley and am writing to object to the Guildford Local Plan which proposes 593 new houses in the Horsleys within 5 years. This would be a huge increase of about a third on the existing number of households, imposing huge damage to the environment and the character of the villages in an unacceptably short timescale.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6192</th>
<th>Respondent:</th>
<th>8817953 / Sheena Ewen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. There is a lack of transparency in the underlying assessment of needs which is completely unacceptable. The effects on traffic would be woeful and a suitable solution is not apparent in the plan.

I set out below my objection to specific policies and matters within the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1165  **Respondent:** 8818017 / Anita Hose  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am at a loss to understand the need for all these houses in Horsley. Our local population has not gone up, birth rate is stable. Therefore, where are all these people coming from?

This is a Green Belt area also a SSI area, and must be preserved. We elected Guildford Council to consider and abide by the wishes of its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4558  **Respondent:** 8818433 / Julian Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the 2016 Local Plan for the Guildford area as it is flawed at many levels and demand that it be withdrawn and re-written to reflect the real requirements of both the local community and our national needs. The draft sets out a policy of green belt destruction to meet a set of questionable targets that bears no relationship to the requirements of the local community. Instead it attempts to impose on us the ambitious aspirations of a few local individuals and in some instances councillors who threaten us with even greater destruction of our communities and countryside if we do not adopt this plan.

Guilford is fortunate in having an area of outstanding natural beauty to the west and thankfully this is protected. The Green belt to the east is of equal importance and I strongly object to plans to destroy it through urban sprawl and industrial zoning. The planned growth figures were questionable before the EU referendum and are now a substantial over estimate given the national governments own forecast for the economy for the next decade. Consequently a significant reduction in the number of new homes should be adopted and conditioned by the opportunity to develop them on existing brown field sites in the Borough. Destruction of the green belt to the east of Guildford is indefensible not only because it would be an irretrievable loss to future generations but because its infrastructure which is already under extreme pressure could not cope with further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In summary the plan needs to be re-examined once again post Brexit and the growth plan focused on redevelopment of brown field sites in the Borough. We have no right to destroy the Green Belt, it's the property of future generations!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3564  Respondent: 8818689 / Janet Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thirdly I object to the complete disregard to locals feelings in producing such an intensive plan. We have a duty to our children to protect this beautiful part of the country for future generations, and not to destroy it simply for profit and gain.

Please, please do not have this intended destruction on your consciences, and have the good sense to preserve the Green Belt as the lungs of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13767  Respondent: 8819265 / Alan Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5989  Respondent: 8819329 / Lindsey Haines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to Policy S2. This allows for 25% increase in housing stock in Guildford Borough Council whilst population increase is estimated by official statisticians' forecast to be 15%. Is this because Guildford Borough Council has decided to pursue a policy of aggressive expansion? I am not aware that the local electorate has been asked if it wants this. I object to Guildford Borough Council’s policy of excessive growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/582  Respondent: 8819457 / Howard Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please note that I hereby formally object to:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

• The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2). The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough's designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.
• The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2). The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity. With a presumption for development within these 'inset' areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.
• Garlick's Arch (policy A43) The proposal to build 400 houses and 7,000sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council's 'Issues and Options report' or identified for development in the 2014 consultation. In 2014 the Council rejected a planning application from 'Oldlands' to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there? Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/Burnt Common has one just shop (Waitrose), no doctors' surgery, no schools and the local roads are already filled to capacity. Any development at all in this area world be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41%.

The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. It is totally inappropriate and would destroy the village's demarcation from Ripley, creating urban sprawl.

This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.

• New north and southbound slip-roads to and from the A3 to the A 247 Clandon Road (policy A43a) This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and
where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/629  Respondent: 8819457 / Howard Turner  Agent:

Policy'S2 - The 12,426 (654 per year) number of homes that the Plan intends to deliver over the 19 year period 2015-2034.

Although the target for housing has now been reduced from 693 to 654 per year, it is still far too high and falls to take account of the constraints which should have been imposed by the high proportion of the boroughs designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to Support such an increase in the population.

I therefore object to the calculation of assessed need for housing and other development in the area and the grossly disproportionate impact oldie Local Plan's proposals on its more northerly communities of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13208  Respondent: 8820353 / Gillian Beaton  Agent:

POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The
Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.1.8

- development around villages (including some expansion).

This is entirely CONTRARY to the purpose of the Green Belt, i.e. to prevent suburban sprawl.

Policy S This plan is based on growth projections agreed by whom? Just because there is an expert report stating this projected population growth does not mean that we, the voters, want it. UK exiting the EU surely makes a nonsense of the projected inflow from Greater London. Why does the University have carte blanche to increase its student population?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13152  Respondent: 8824609 / Richard Sands  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13157  Respondent: 8824609 / Richard Sands  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the Borough Wide Strategy (Policy S2) GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2- Planning for the Borough

Evidence Base - The Strategic Housing Market Assessment

This policy is key to the whole of the Local Plan and underpins all the plans for development. The MRA has commented on the earlier SHMA and has attended numerous meetings to evaluate every element of the SHMA. We have always been troubled by the very high OAN in the SHMA and fail to understand why the figure is so high leading to a housing target that is so much higher than the housing target that has been set by the Council of GBC in recent years.

We commented at an earlier stage of the development of this draft Local Plan as follows:

“The assessment of housing need in the current draft SHMA is not justified by an analysis of the data. A new joint local authority SHMA is being prepared but will only be available for scrutiny after this consultation has been concluded. Meanwhile new ONS statistics predict the population of Guildford will be just under 5000 people fewer than assumed in the draft Guildford SHMA, greatly reducing the need for additional housing. The MRA believes that even these new ONS figures overstate the likely population growth as virtually all the growth to 2021 is predicted to come from net international migration. This prediction is based upon the net international migration over the past 5 years which is highly unlikely to be repeated. It should be noted that the draft SHMA does explain that student international migration associated with the University will only present a very limited housing need.”

Subsequently the Guildford Residents Associations (GRA) commissioned a review of the SHMA and the OAN by NM Strategic Solutions Ltd (NMSS) and GBC will, we are sure, be aware of the detail in that report which the GRA will be taking forward to the Examination in Public of our Local Plan. This report appears on the GRA website http://www.guildfordresidents.co.uk/

The OAN suggested by NMSS is 510 and this is a figure that we can support. We understand and accept that ‘standing still’ is not an option and that an OAN must be set for the Borough of Guildford to follow the guidelines in the NPPF and the PPG. This is exactly what NMSS have done to meet the demands for new housing, business and schools in Guildford. We do not intend to repeat the detailed arguments from NMSS in this response except to point out that the report does meet our concerns about international and student migration to which we have referred in previous responses to GBC and the OAN appears far more sensible and reasonable than the figure in the West Surrey SHMA of September 2015. In summary NMSS suggests that the September 2015 West Surrey SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

We are aware that CPRE has also commissioned an independent review of the SHMA and the OAN by Green Balance and they recommend that the OAN for homes in Guildford should be reduced from 693 to 481- a figure that is independently and remarkably close to the figure from NMSS.

We conclude that the OAN for Guildford should be set at no more than 510 new homes per year in accordance with the conclusions of the report from NMSS.

Housing Target- We are concerned not only at the high housing target that appears in Policy S2 but also at the way that the numbers have been presented in both the draft Local Plan and also in the Land Availability Assessment. It is suggested in Policy S2 that the housing target for the period of the plan is 13,860 but a detailed examination would indicate that it is either 15,116 as this figure appears in the LAA on page 17 or 15,060 being the figure that can be
calculated from table I on page 28 of the draft Local Plan after adding the numbers in the table to the homes with planning permission taken from the text in the LAA. This is confounded by the fact that the table in the LAA on page 17 adds up to 13,708 and the Local Plan table on page 28 to 13,652 and although very similar are not identical - when they should be exactly the same.

We object to the way that the housing target has been inflated in this way to a figure that is significantly in excess of the OAN. The Local Plan commentary states that the number of new homes is greater than the figure in the policy to allow for flexibility but as with most figures in this plan, that figure is open to a different interpretation.

We conclude that the housing target in the draft Local Plan is confusing and should be corrected.

Constraints - The housing target of 693 does not reflect the fact that there are real constraints in the borough, that we are a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. Further comment on this appears on page 7 et seq. This is a serious failure in this draft Plan. In particular the Green Belt is a real and valid constraint and has not been given sufficient weight in the draft as described above.

We conclude that the draft Local Plan does not follow the NPPF, the PPG nor the advice of Ministers in the DCLG.

We object to Policy S2 as it is unsound and unsustainable on three counts, described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1227  Respondent: 8825057 / Merrow Residents' Association (Keith Meldrum)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

MRA has commented on the earlier drafts of the SHMA and voiced its objection to the OAN. We now wish to comment on the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017. We dispute the revised OAN. Even though the housing target figure has been reduced to 12,426 homes (558 pa), we believe it is based on a fundamentally flawed analysis of the demographic and economic need figures that have been produced by GL Hearn.

GRA commissioned a review by NM Strategic Solutions Ltd (NMSS) of the Addendum Report as well as the original SHMA. Their detailed reports and the credentials of Neil McDonald who prepared them can be found on the GRA website.

The NMSS study established through a thorough analysis that there are a number of serious defects in GL Hearn’s Report which cast grave doubt on the reliability of their OAN. In particular, GL Hearn have seriously over-estimated the population growth for Guildford which can be largely attributed to significantly over-estimating net migration into Guildford in student age groups, most probably as a result of the under-recording of student migration out of Guildford. If plausible adjustments for the outflow of students in the period 2001-15 are made, this would reduce the demographically-based estimate of the number of homes needed for the period 2015-34 from 558 to 404 pa based on student figures alone. Furthermore, trust in the OAN is also undermined by GL Hearn’s totally flawed estimates of the number of homes needed to support economic growth.

We consider that the significant shortcomings in GL Hearn’s Reports highlighted in NMSS’s Review make it impossible
for GBC to make an informed, evidence-based decision on the housing figure. Consequently, in common with many
other Guildford organisations and individuals, we have no confidence in the SHMA and OAN produced by GL Hearn to
the extent that the Local Plan should not rely or depend on them.

We therefore object to Policy S2 and the OAN in G L Hearn’s Report which should be disregarded.

hope that they can narrow the gap with particular reference to the students that leave Guildford on completion of their
studies which, clearly, has a very considerable impact on the demographically-based estimate of the number of homes
needed for the period 2015-34.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5566  Respondent: 8826081 / Simon Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6768  Respondent: 8826145 / William Hewlett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. Comments relating to Policy S2: Planning for the borough - our spatial development strategy

I OBJECT fundamentally to the whole basis of the proposal to build 13,860 new homes, which is non-transparent and undemocratic:

- No justification is given for the 13,860 housing figure, which is based on a non-disclosed formula used by consultants and never seen by anyone on the Council or by the public. The Council has failed to seek disclosure of the formula.
- The 13,860 figure confuses the OAN with a housing target, and no definite housing target is given. How can we comment when we don’t know how many houses the Council want to build?
- The figures are based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: why should Guildford need to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- The high numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.
- Over the time period of this Plan, Brexit may affect the numbers related to growth and demographic data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3118  Respondent: 8826177 / Charles Spence  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2 which states that provision will be made for 13,860 new homes. From my reading, the need for this number of new homes is based on flawed assumptions and assessment of future housing needs. This undermines the foundation of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation is welcomed but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt. The changes also mean that the eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.

2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other types of Council have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,426 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes proposed the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In the Foreword to the Plan, page 7, Monika Juneja states that “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place”

I am a resident of Worplesdon parish in which I therefore take a particular interest. Worplesdon currently has 3577 dwellings. The proposed housing developments in Worplesdon are Blackwell farm, of which at least 1000 houses will fall within the parish, Fairlands (safeguarded) 773 houses, Liddington Hall 625 houses and Keens Lane 140 homes. This totals 2538 homes which would be an increase of 71% to housing in the parish. In a Green Belt area with only minor roads this is in direct contradiction to Ms Juneja’s statement and is without a thought for the local infrastructure which is already overburdened before a single new house is built.

In the Key Facts, para 2.2, you predict that the population of Guildford will increase to 155,400 by 2031. This is an increase of 15,700 from 2012. Why then are you proposing to build 13,040 new homes? This housing number is clearly an over-estimate and will result, if you have your way, of large swathes of Green Belt land being concreted over unnecessarily.

Furthermore the University has not used its land at Manor Farm to build the 4,700 accommodation units for which they were given permission. They have in fact only built 1,665 – that is a shortfall of 3,125. Therefore these students are having to find other accommodation in the borough, so adding to the number of other homes now needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

2. **Number of new houses and density (Policies S1, S2, H1 and H2)**

I object to the proposals relating to the number of new houses and the density of such housing.

- The housing numbers proposed across the borough are for 13,800 homes over the Plan Period to This number is too high and unsustainable in Guildford's villages. The model used to calculate the number has not been seen or the assumptions tested by the Council or any of its officers. It has been, on numerous occasions, shown to be flawed by various third parties. This housing target will result in the borough's permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

- In West Horsley, the 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
It is clear that development along the lines provided in the Local Plan is completely unsustainable, as well as a betrayal of the whole concept of the Green Belt. Many residents do recognize that there may be a need for a limited amount of additional housing, but the current draft Local Plan is absolutely not the way to address this requirement. There is no alternative but for the Council to revise the housing number down significantly, to amend the Local Plan to make greater use of brownfield/previously used land rather than green field sites (of which there are significant amounts of the former within the Borough), and to propose credible, evidence-based plans for how the sustainability of any development will be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Borough Wide Strategy (Policy S2)

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough.

The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/2959 **Respondent:** 8827809 / Robert Wood **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside 'West Surrey'. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It
is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make 'West Surrey' reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's 'need'. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered 'sound'.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is 'deliverable' and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission.

Constraints in the supply chain and maintaining profit levels have been more important. The plan cannot be considered 'deliverable'. In addition, the number of homes proposed, plus existing planning permissions, plus expected 'windfall' sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a 'plan' that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears
to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Glandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Glandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Glandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6510  Respondent: 8828385 / Thomas Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like my objections to be noted and the draft Local Plan (June 2016) amended.

I object to the quoted housing need amount of 13,860 for the borough which is far too high

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3706  Respondent: 8828417 / Valerie Wild  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough wide strategy

OBJECT. Again, the huge number of houses makes no sense for Guildford, a 'gap town' with serious movement restrictions and natural constraints. The Council has the right not to build on the Green Belt but has not taken it. The SHMA figures have been widely and rightly criticised for many reasons but scrutiny of the methodology has been denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11094  Respondent: 8828545 / Anjali Mittal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach.
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA.

I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a plan that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5536  Respondent: 8830049 / Peter Hooley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having written in September 2014 to object to the original Draft Local Plan, I am deeply concerned about the 2016 Plan which seems virtually unchanged and containing the same flaws. Namely:

- The wholesale removal of rural villages, in particular Ripley, Wisley, Clandon, Send and E & W Horsley, from the Green Belt;
- The monster building proposals at Wisely, already rejected by the GBC as unsuitable, Burnt Common, Gosden Hill and Blackwell Farm;
- As well as the proposed 385 new homes in my village, West Horsley, which is completely disproportionate to the 1,100 existing homes in the village - an expansion of the size of the village by nearly 40%;
- The evidence for this scale of new housing number, namely 14,000, is just not there; nor is the infrastructure in terms of shops, schools, doctors' surgeries, railways and car.

The proposals in this Plan are completely disproportionate and unjustified, and are a disservice to the need for a properly controlled expansion of our housing stock in the UK. I hereby register my objection to the 2016 Draft Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/895</th>
<th>Respondent: 8830049 / Peter Hooley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Whilst the overall housing growth forecast on which the plan is based has been reduced, it is still based on a disproportionately high growth assumption of nearly 25% growth by 2034. This is virtually double that of the Office for National Statistics for Guildford.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/8137</th>
<th>Respondent: 8830721 / Surrey Hills AONB (Clive Smith)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. I Object to the unsustainably high level of development planned for the Borough as it would put harmful pressures on its protected AONB and AGLV landscapes, especially in the longer term to the detriment of future generations. This has not been justified within the Plan and seems to have been overlooked by the Council. Instead the Plan and its inadequate Sustainability Appraisal are based upon at least meeting the objectively assessed development needs calculations. That approach seems to be at odds with Government planning policy in the highlighted NPPF paragraph 14, requiring specific policies in the Framework (such as AONB and Green Belt designations that largely cover the Borough) restricting development to be balanced with meeting objectively assessed needs. No evidence so far exists that local communities support the Plan’s departure from Government policy in the NPPF or the accepted international definition of sustainable development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13773</th>
<th>Respondent: 8830753 / Graham Thorpe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The volume of additional housing and the accompanying loss of Green Belt land required to accommodate this is a brutal over-reaction to genuine planning needs. These latest proposals appear to be crudely based around some artificially drawn numbers already challenged without adequate reply in response to earlier consultations on this matter. The methodology employed for the SHMA remains a complete mystery and its subsequent handling by GBC is beyond reason. The only clear impression that leaves is of a design that simply seeks to identify all green spaces adjacent to existing housing and calculating the number of new dwellings that could be sited using a standard model to produce a number. We do not need a complex planning process and the use of expensive private consultants to reach such a flawed outcome. Any number of residents in the Horsleleys could identify the selected plots if asked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14740  Respondent: 8831393 / John Dumbleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this policy as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on how constraints should be applied.

This policy is based on the Evidence Base of the Strategic Housing Market Assessment. The housing target of 37,200 new homes during the plan period is obviously too high and based on OAN data in GL Hearn’s report that many organisations in Guildford have questioned e.g. new ONS statistics for a lower predicted population of Guildford; and high net international migration which is wrongly associated with the University and is now much more unlikely as a result of BREXIT.

The housing target does not reflect the real constraints in the borough, that Guildford is a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis, in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. In particular the Green Belt as a critical constraint has not been given sufficient weight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16954  Respondent: 8831393 / John Dumbleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2- PLANNING FOR THE BOROUGH

I object to this policy as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on how constraints should be applied.
This policy is based on the Evidence Base of the Strategic Housing Market Assessment. The housing target of 37,200 new homes during the plan period is obviously too high and based on OAN data in GL Hearn’s report that many organisations in Guildford have questioned e.g. new ONS statistics for a lower predicted population of Guildford; and high net international migration which is wrongly associated with the University and is now much more unlikely as a result of BREXIT.

The housing target does not reflect the real constraints in the borough, that Guildford is a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis, in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. In particular the Green Belt as a critical constraint has not been given sufficient weight.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1898  Respondent: 8831521 / Denis Coulon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3807  Respondent: 8831681 / Helen Cowell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The local plan seeks to add approximately 5,000 new houses in an area within a 5 mile radius of East Horsley. This number of new houses is unsustainable in this small area – it will almost double the number of houses currently in the villages of East and West Horsley. I object to the inclusion of such a large number of new houses in this area and consider that the local plan should be amended to take out any sites which are on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14967  Respondent: 8831809 / Ann Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- **Strategic Balance**: the draft Plan stresses the importance of the Green Belt but then proceeds to eat into it in a completely unbalanced way. This area of the borough (Clandon and Send) is taking a disproportionate share of the new building requirements over the Plan period. Together with Wisley, we end up with an urban swathe running from the M25 through to Burpham. This will completely change the nature of the whole of this part of the borough. It is not what local people want, as has been very clear from responses to previous consultations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3278</th>
<th>Respondent:</th>
<th>8832513 / Richard Russell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today's 4x4's, long wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a 'District Centre' which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant's mathematical formula of which no qualification or calculation is to be made available. As if this wasn't unacceptable enough, the consultant's unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?

Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following a major public outcry, GBC's Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan - a clear invitation to the developers that they should try again. This is not a NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC's Planning Committee on 5th April 2016. These include:

- Green Belt location and absence of "exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating 2,000 dwellings within the village of Ockham's 159
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity
- Impact on listed buildings
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA
- Extreme housing density with tiny garden spaces
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please find below a series of individual OBJECTIONS which I request you take into consideration when giving further consideration to the merits of the 2016 GBC Draft Local Plan.

Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2244  Respondent: 8833857 / Gail Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to this strategy. The SHMA figure is shrouded in secrecy. This fundamental calculation is at the heart of the local plan and appears excessive. The proportionately large number of students housed off campus means less housing for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17402  Respondent: 8834689 / of NLP Ltd c/o Solum Regeneration (Dennis Pope)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 confirms (in the preamble at para 4.1.6) that the preference within the plan is to focus growth in the most sustainable locations, making the best use of previously developed land including within Guildford Town Centre and that 13,860 dwellings will be provided in the Plan period.

However, despite this stated preference, Table 1- Planned Delivery between 2018 and 2033 confirms as stated above that only 1,172 units - i.e. just 8.5% of the total dwellings requirement will be directed to Guildford Town Centre.

Consistent with our comments above, we consider that much greater emphasis should be placed on maximising opportunities to meet housing need on sustainable brownfield land with the Town Centre. Such an approach would also be consistent with draft Policy H1: Homes for All - see comments below.

We would therefore suggest that after the first paragraph the following sentence should be added:
"In bringing forward development, there will be a strong preference to focus and maximise growth in the most sustainable locations, particularly within Guildford Town Centre and other urban areas, making the best use of previously developed land."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8284</th>
<th>Respondent: 8835425 / Martin O'Hara</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**HOUSING NEED**

I do not consider that the case regarding the need for the proposed overall number of houses in Guildford borough has been proven.

The target house building programme proposed represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of National Statistics (ONS) only projects a population increase of some 15% for the borough of Guildford over the same period. Something just doesn’t make sense. Certainly the proposed increase in the number of new houses required has not been proven for the village of West Horsley.

In my opinion the Proposed Submission Local Plan in respect of West Horsley is excessive in terms of the potential residential provision currently indicated. I do not believe that the scale of development proposed, in any way, reflects the actual need, nor that it respects the local character and existing built density of the village.

I therefore **OBJECT to the current site allocations and housing densities** proposed for all four sites in West Horsley.

I would further make the point that the Guildford Borough Economic Strategy 2013 – 2031 made no such case for siting large numbers of residential units within West Horsley. As previously stated, West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals, which are focussed on the opposite side of the borough.

Furthermore, I understand that in March 2014 the Government published a new web-based Planning Practise Guidance (Housing & economic land availability assessment, Methodology – stage 5: Final evidence base, 6 March 2014) to accompany and give further detail about the policies in the NPPF. This guidance set out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify development within the Green Belt. It states “*Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt*.”
On 4th October 2014, I understand that the Government announced that it had further updated its online Planning Practise Guidance. The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and to protect the green lungs around towns and cities”. The Government said that it wanted to make planning policy clear that **housing need does not justify the harm done to the Green Belt by inappropriate development.**

The new guidance included the statement that: **“The Framework (NPPF) makes clear that, once established, Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”**

---

**Do local planning authorities have to meet full housing needs identified in needs assessments?** – Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period, and in so doing **take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”**

I further understand that on 19 December 2014 the Planning Minister wrote to the Chief Executive at the Planning Inspectorate about Strategic Housing Market Assessments. This letter set out the relationship between housing figures produced as part of a Strategic Housing Market Assessment and those in a Local Plan and how to take into account constraints such as Green Belt land. It contained the following: **“However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans.”**

**It does not immediately or in itself invalidate housing numbers in existing Local Plans. Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement.”**

It is my view that the overall extent of development required in the borough necessary to meet the employment and housing needs in the borough and, as set out in Policy S2, has not been satisfactorily defined having regard to the methodology summarised above.

The West Surrey Strategic Housing Market Assessment (SHMA) assesses an Objectively Assessed Need (OAN) of 693 dwellings per annum “**but does not take into account land supply, policy or other constraints to development**”. as per paragraph 1.2 of the Guildford Summary Report – October 2015. This figure is acknowledged as including upwards adjustments to support growth in student numbers and higher migration levels than are shown in the 2012-based Population Projections and represents an OAN 23% higher than need calculated through London sensitivity analysis, as per paragraphs 4.1 – 4.2 of the same Guildford Summary Report.

Policy S2 of the Proposed Local Plan then, apparently uncritically, applies this OAN figure to identify a housing requirement of 13,860 dwellings for the plan period (20 years at 693 dwellings per annum). There is no evidence to indicate that in defining this figure GBC has undertaken a careful consideration of “**whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement**” and which may well indicate that development should be restricted.

Furthermore, I also understand that GBC will not release details of the methodology used by their third party consultants to arrive at the OAN figures used, which, in my opinion, also makes the likelihood of the Proposed Local Plan being considered unsound in this respect highly unlikely.
Given that these OAN figures then play such a fundamental role in many of the Site and Strategy issues (and in particular Site Allocation) I believe that much of the Proposed Local Plan is very much open to challenge, possibly including judicial review.

In my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is simply not supported by adequate justification.

As previously stated, in my opinion, a disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear a particularly excessive proportion of this proposed development, despite the numerous counterevailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

It should be noted that, within the Draft Guildford Borough Local Plan; Strategy & Sites: July 2014, GBC proposed the possible site allocation for a total of 434 houses within West Horsley (plus a further 100 abutting the parish boundary in East Horsley) including 185 homes on Land to the west of Silkmore Lane and no mention of development on the sites now proposed under Policies A37 nor A41.

Many of us objected to the same and, quite correctly, the Silkmore Lane site was removed from the current Proposed Local Plan. We were amazed however to see that, in lieu, site allocations were now proposed for sites A37 and A41 proposing a total further 130 homes on these two sites! It seems to me as though GBC have predetermined that West Horsley should ‘suffer’ approx. 450 homes come what may and, if not on initially proposed sites then on others. Are we truly meant to believe that GBC, having removed this Silkmore Lane site in the village, found that sequentially the next two most ‘appropriate sites for residential development’, within the whole of the borough of Guildford were in the very same village? I don’t think so!!

I cannot, for the life of me, see how any ‘need’ for the proposed number of houses can be proven. This feels like pure opportunism on behalf of GBC and landowners.

I therefore OBJECT to the borough housing targets set out in Policy S2.

Furthermore, I am also concerned that all of the proposed Site Allocation sites are currently designated for years 1 – 5 of the plan which I feel, if adopted, would only exacerbate local infrastructure problems, set out later in this representation. Finally, delivery of whatever provision is adopted should at least be phased so as to control the construction traffic impact. Such prolonged phasing should also assist the developers in their ‘take up’, by phasing the delivery and release to the market.

I therefore OBJECT to the proposed timing of any adopted housing targets. I would ask that they be reconsidered and redistributed so as to phase delivery with reference to delivery of the necessary supporting infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**SUMMARY**

The Green Belt within Guildford borough is a Regional and National asset. It must be protected in so far as is absolutely possible.

Every effort must be made to locate proposed new housing on existing brownfield sites close to areas of employment, before the ‘easy option’ of allowing development of greenfield sites is permitted.

I remain unconvinced that the Proposed Submission Local Plan: Strategy & Sites 2016 has fully exhausted the possibilities for residential development on such land, preferring to reserve many such areas of land for potential employment or education opportunities, which may not fully require the same.

I remain completely unconvinced as to the proven need (OAN) for the full extent of new housing proposed. In my opinion the scale of potential development proposed in West Horsley, in particular, is excessive, disproportionate and inappropriate. For the reasons previously stated I believe that it should be limited in terms of both potential locations for proposed development and permitted density. It is a semi-rural village and any future development should both respect and contribute to its local character, context and distinctiveness, not detract from or, at worse, destroy the same.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15759  **Respondent:** 8836129 / Roger Shapley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

13,860 homes are proposed at a build rate of 693 per annum. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% within 7km mitigation zone of SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. Were the housing number substantially lower, meeting housing need, there would be no need to build on Green Belt or open countryside. The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860.

This policy is flawed for the following reasons:

1. it is not subject to the constraints imposed by the fact that 89% of the borough is Green Belt and inadequate infrastructure;
2. it does not require ‘brownfield’ sites to be used first;
3. it does not reflect Government policy to reduce international migration which accounts for the majority of the projected population growth;
4. it fails to require Surrey University to house its own students (if the university built out the land on which it already has planning permission for student accommodation, it would house not only the future growth of student numbers but many of the students occupying properties in Guildford which could therefore be released for affordable housing);
5. it proposes ‘insetting’ 16 out of 24 villages in the Borough and identifies a few very large areas of land to be “strategic sites” without presenting the ‘exceptional circumstances’ required to redraw Green Belt boundaries

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to the disproportionate concentration of new housing numbers proposed to the east of Guildford. This would result in massive overloading for schools, medical centres, public transport and local roads. The population of East and West Horsley is currently c. 2800; the draft plan proposes nearly 5000 new houses within a 5 mile radius of Horsley, that is an approximate 80% increase. This is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

It seems that in their desperation to maximise the new housing numbers in the Local Plan, GBC Councillors have chosen to ignore the wishes of their existing electors and residents. Is this an example of democracy working fairly?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.
I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7062  **Respondent:** 8837313 / Maria Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey"tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or

On any common sense view, "West Surrey" is much too small. Half of Guildford borough ’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, Guildford town centre is outside the HMA. It is no justification to say that the tri-borough area has been used inthe past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour 's "need".

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Rpley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley.Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses

are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16923  
Respondent: 8837729 / Harry Clarke  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My principal objections to the Local Plan are:

[...]

• Inadequate infrastructure improvements to support already overcrowded roads and railways.
• Increased traffic congestion and journey times, due to the developments
• Increased pollution from the traffic and developments causing health problems for residents, and irreversible damage to protected sites (nitrate deposits).
• Reduction in quality of life, due to increased stress due. For example, large increase in cyclists over the last ten years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16925  
Respondent: 8837729 / Harry Clarke  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Policy S2 – object
   1. The number of houses is too high, which will result in the permanent loss of Green Belt land, and irreversible damage to SPAs.
   2. Constraints imposed by the Green Belt, AONB and SPAs have not been properly taken into account in setting the housing numbers in the Local Plan. If these were properly applied then this would result in a lower number.
   3. I am not convinced by the evidence presented for the number of houses. In particular the Economic Assessment has resulted in an inflated demand for houses. Councillor David Reeve for Clandon & Horsley has produced “A Review of the Guildford Objectively Assessed Housing Need”, July 2016.
   4. Housing needs require reassessment in light of the Brexit vote, and the economic uncertainties that this has caused, which will result in reduced levels of growth, certainly until negations are completed on exit from the EU and new trade deals negotiated. The outcome of these talks won’t be known for at least 5 years and may well take much longer, despite the over-inflated optimism of some politicians.
   5. The housing numbers are unsustainable
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16210  Respondent: 8839041 / Jon Maslin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents’ groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of ‘double speak’ has led to absurdities such as ‘affordable housing’ which is over £300,000 i.e. ten times the average salary; ‘safeguarding’ which does not mean protection of land as most people would think, but rather potential future development and ’insetting’ which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

‘About ancient woodlands, of course they are very attractive things, but they are ancient and trees don’t last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life’

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?
It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN ‘objectively assessed need’ figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. ‘It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.’

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development ‘because of the environmental constraints which exist in the County, including Green Belt’. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled ‘A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford’. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that
none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

• The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

• There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

• The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. ‘the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt’ - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. ‘we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt’ – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

2. ‘Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt’ – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. Of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, ‘We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.’ I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As residents of the ‘Guildford Community’ we have been sympathetic to the need for additional housing in the Borough to satisfy quantifiable demand, but feel that this has not been addressed by the 2016 Guildford Borough Council Local Plan.

We believe housing development should: meet the needs of the local community; respect the Green Belt and long established settlement boundaries; be in keeping with existing development in terms of scale and density; have regard to the local infrastructure and be sympathetic to proximity to AONB.

We feel that the number of new homes proposed in the Borough is significantly higher than those that would be required based on population projections of the ONS figures. In addition the location of the developments has little regard to the NPPF rules, particularly in respect of the ‘Horsley Green Belt’ and changes to boundaries.

Our specific objections to The Local Plan Proposals are as follows:

POLICY S2: Borough Wide Strategy

The proposed increase in housing stock in the Borough is 25% which is in excess of the ONS population projections of a 15% increase.

We object to this Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

6) I OBJECT to the Policy S2

The 2017 Local Plan continues to contain some of the unproven assumptions of previous versions of the Local Plan such as housing numbers. The amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn has not addressed many of the 32,000 objections made to the 2016 plan. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA), a group made up of parish councils and residents associations from across Guildford Borough, has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. Once other permitted constraints are allowed, that figure could be revised downwards even further. These constraints, in line with government policy to protect Green Belt and make sure development is supported by adequate infrastructure, could correct the OAN by approximately 50%. This is what neighbouring Woking Borough Council have done. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose, resulting in an unsustainable and inappropriate plan, based on erroneous assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. Every new green belt site reduces the chance that a future brownfield site will be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The 2017 Draft Local Plan for Guildford continues to contain some of the unproven assumptions of previous drafts of the proposed Local Plan such as housing numbers. The amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn has not addressed many of the 32,000 objections made to the 2016 plan. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA), a group made up of parish councils and residents associations from across Guildford Borough, has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. Once other permitted constraints are allowed, that figure could be revised downwards even further. These constraints, in line with government policy to protect Green Belt and make sure development is supported by adequate infrastructure, could correct the OAN by approximately 50%. This is what neighbouring Woking Borough Council have done. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose, resulting in an unsustainable and inappropriate plan, based on erroneous assumptions.

Thus, I object to the amended policy S2 the Borough Wide Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/13409  Respondent: 8840033 / Jimmy Daboo  Agent:
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13432  Respondent:  8840033 / Jimmy Daboo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may well conclude that the consultation has not been properly conducted. The Council should also consider the impact that objections (which will inevitably be made) on any planning applications on these sites will have on its capacity to deal with planning matters.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16114</th>
<th>Respondent: 8840161 / Richard Ayears</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate allocation of housing in this the Lovelace Ward and neighbouring parishes. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ripley, Ockham, Send and the Horsley’s (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13679</th>
<th>Respondent: 8840193 / David K Reynolds</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• We object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7104</th>
<th>Respondent: 8840257 / Nicola Theo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/951  Respondent: 8840289 / Esther Hayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I object to the disproportionate allocation of new housing to this area as a whole - there are a considerable number of houses proposed not only at Three Farm Meadows, but large sites in Horsley and Ripley. This will damage the nature of the area and result in a huge burden on inadequate and already-strained infrastructure and local services.

The Local Plan, as it stands, will turn this part of Surrey from an attractive, sought-after, green and clean place to live into an extension of the London sprawl. We have a responsibility to protect this lovely environment for future generations, or there will soon be none left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13178  Respondent: 8840449 / David Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Planning for the borough - our spatial development

2.1. I OBJECT to this policy. This policy aims to add 13,860 new homes to Guildford Borough over 2013-2033. This is equivalent to 693 new homes per annum.

2.2. The numbers seem to result from a forced growth policy rather than a reasoned analysis.

2.3. Furthermore, students have not been properly accounted for, and it does not (but should) require the University of Surrey to build the student accommodation that it previously committed to.

2.4. Others far better qualified than me have explained that these numbers are excessive and based upon false assumptions and using a model that the public have not been allowed full access to so that it can be properly verified. Nevertheless, from the limit information provided to some, Councillor David Reeve and Guildford Residents Association (who I believe used an independent expert) have separately identified numerous errors that need correcting and will lead to a reduction in forecast numbers. Furthermore, the economic growth rate forecasts need to be revisited in the light of Brexit which is already causing an economic slow down.
2.5. The SHMA numbers therefore need to be revised downwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18175  
Respondent: 8843361 / Adrian Atkinson  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt and growth not in keeping with the capacity of the borough. Theses previous plans concluded that sufficient land to arise within the urban areas to accommodate this requirement. However, GBC have ignored the potential of the urban area to provide for housing. The current plan now is going hell for leather for Green Belt development and are ignoring government policy in relation to the Green Belt. I read, in detail the most damming report by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) which concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. I’m sure others will comment on this report in detail so I won’t but I fully support the conclusions. Not because the number is lower but I believe it passes the test of Objectively Assessed Need. When one goes back to the 2014 presentation by JULIAN D S LYON MBA FRICS of the Guildford Society on the Draft Strategic Market Housing Assessment (SHMA). Nuances maybe different but the general trajectory and logic still remains the same. The Guildford Society concluded in 2014:

1 The premise for the housing data in the Draft SHMA published by GL Hearn looks deeply flawed and a full demographic analysis needs to be undertaken to understand the NEED for housing in Guildford during the Local Plan period

2 The Guildford Society’s simplistic analysis suggests the actual need figure that should be in the SHMA is in the range 435 to 641, and is probably closer to 507.

3 The Guildford Society has urged Guildford Borough Council to re-examine the core data (particularly within age-group cohorts aged 18 to 24 in 2011) before it moves to adopt any report or figure as the basis for its Objective Assessment of Housing Need in the Emerging Local Plan

http://www.guildfordsociety.org.uk/2014_March_Housing_Series_4_503D6C51E8ED.pdf

The figure of 507 is stunningly close to the figure that the GRA report suggests is the correct figure of 510 per year.

In research and science, "objective" is without bias. To be properly considered objective, the results or claim must be
communicated from person to person, then demonstrated for third parties and repeatable by other third parties using the same methods with the same results.

Around 510 seems to be an objective number - two independent bodies coming up with the same results 2 years apart essentially using the same data. GL Hearn’s number seems to be “subjective” as no-one seems to be able to get anywhere near repeating the results. In trying to do so some very smart people have spotted issues and flaws in GL Hearn’s work.

What's more the Guildford Residents Association and Guildford Society have identified exactly the same issues such as the treatment of the blip in Guildford student age cohort which is far in excess of any other similar university town. The Guildford Society show that the vast majority of the growth of the university has come from overseas students since 2000-2011. This is an anomaly the GRA study highlights as an issue with current SHMA which the Council refuse to consider.

From the 2011 census 8% of Guildford residents were in FULL TIME education vs 3.5% for Surrey - for Guildford that is 12,000 full time students on a population of roughly 150k.

The independent expert suggests:

"The analysis of the impact which potential increases in student numbers may have on the overall housing needs of any university town is complex and best carried out separately from a general demographic analysis. Given that students are a significant part of Guildford’s population and there are substantial uncertainties in the calculations, there is a strong case for carrying out such a separate analysis and, possibly, setting a separate requirement for student housing."

Back of a fag packed packet calculation conservatively makes this a £10-12billion decision excluding the infrastructure costs and town center redevelopment. That is ignoring the devastation to endangered species residing in our green belt and premature deaths resulting from increased air pollution. I suggest the Council would be negligent if it did not examine the numbers in the evidence and not take GL Hearn's number in blind faith, enough people have put them on notice that they should If one looks at the Green Balance report findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because So we have 3 completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable and unsound. Just because someone is a third party, one cannot conclude their conclusions are “objective”.

GL Hearn is owned by a property and infrastructure business, why should their study be accepted without scrutiny. Guildford has some specific historic dynamics and population structure which cannot be just put into an off the shelf model and hope for robust figures. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Ministerial guidance in relation to building on the Green Belt is clear: “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014. "we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the housing in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical
requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the clear guidance it is only logical to apply CONSTRAINTS in line with government policy to a corrected OAN of around 500 homes. The fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure this has to be substantial. In this plan we have non! have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to ratify the current government policy of protecting the Metropolitan Green Belt and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years. Theresa May, announced on 11 July that she is personally committed to protecting the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7350  Respondent: 8845025 / A Henderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Why is the removal of our Green Belt even being considered when alternative brown field sites can be used to build on? At least exhaust all other possibilities before stealing Green Belt from our future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16837  Respondent: 8845345 / Mike Bailey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Traffic & parking

I object to the plan on the grounds of the additional vehicles and impact this will have on local parking and local roads. Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the Horsley villages. Parking at the, already full, stations, local shops and amenities will all be seriously affected.

Road network

I object to the plan on the grounds of the impact to the local road network, which I do not believe has been adequately addressed. In respect of the proposals for development at Wisley Airfield and for an upgrade the current A3 junction at Burntcommon to a full 4-way junction, SCC traffic modelling anticipates increased use of Guilesshall Lane, Hungry Hill Lane and Tithebarns Lane for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. It appears that the Plan is proposing a strategic site at Wisley Airfield without even knowing what improvements to the local road infrastructure will be
required. If that is the case for Wisley Airfield, then it is almost inevitably true for the proposed developments in East and West Horsley as well.

Pollution

I object to the plan on the grounds of the increased pollution it will cause. The large increase in volume of traffic will cause an increase in air pollution, an issue that is already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/874  Respondent: 8845729 / John.P Burge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing. The building lots of new houses on greenfield sites will make little or no difference to the price of homes in the GBC area unless the number is extreme. There will always be more demand than supply in attractive areas and to try to meet that demand will ultimately destroy the area.

I OBJECT to this policy of "forced growth".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4089  Respondent: 8846177 / Moira Tailby  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The GLP 2016 is suggesting a huge increase in the size of the village of West Horsley – an increase of 35% in the number of homes. This is disproportionate when compared to the proposed increase in other parts of the borough, such as Ash and Tongham 16% and Guildford Town 11%. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5337  Respondent: 8846849 / David Berliand  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1922  Respondent: 8848033 / Paul Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I strongly oppose this policy under the NPPF definition of sustainable development. The Council has not listened to its residents: the housing target is even higher than before. Furthermore, the secretive SHMA calculation used to obtain this figure has not been open to scrutiny even by the Council itself, which demonstrates a shocking lack of democracy and accountability. We are basically being told to put our trust blindly into an outsourced commercial company without knowing if the model or data could be flawed, or if there could be a conflict of interest. For all we know, this company might just be concocting a number out of thin air!

The NPPF and its translation into this document is not really about "growth", but an attempt to put a positive spin on a massive house-building programme to mop up problems with overpopulation and artificial inflation of the housing market. The mantra of "growth" (i.e. economic growth) is still being deliberately confused with increasing population size (i.e. population growth). They are not the same thing. Population growth does not automatically translate to economic growth; in fact the opposite occurs, where the average productivity of individuals in the population falls, which is still currently the case in the UK. There is no reason why boroughs like Guildford have to constantly expand physically in size to be successful. Instead, the responsibility lies with central government to adopt a more targeted national strategy to solve population growth, wealth disparity and housing problems, for example concentrating on areas of the country away from the disproportionately overcrowded South East, where infrastructure is not so heavily oversubscribed, or can be more easily built up.

To put it simply, the borough is severely restricted in both physical expansion and infrastructure by its environment. The town is in a valley split by a river with increasingly active flood plains, surrounded by large swathes of Green Belt, AONB, AGLV and legally protected SPAs and SSSIs. Regulations/principles regarding these areas were put into place specifically for this sort of circumstance: to prevent stupid short-term errors of judgment and stop us from irreversibly destroying the environment and wellbeing of future generations from both a national and international perspective. The proposed strategy does not therefore comply with the NPPF definition of sustainable development - "ensuring that better lives for ourselves don't mean worse lives for future generations", and the guiding principle of "living within the planet's environmental limits" (NPPF Achieving Sustainable Development).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12092  Respondent: 8848641 / Helen Feary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum. I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough while official statisticians at the Office of National Statistics ("ONS") are projecting a population increase of some 15% for Guildford Borough over this same period.

The West Surrey Strategic Housing Market Assessment, ("SHMA") takes the estimate of 517 homes per annum that the official statisticians at the ONS and the Department of Communities and Local Government ("DCLG") predict Guildford will require based upon their population and household forecasts and adds another 120 homes per annum to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

This increase is not valid. Economic growth is already factored into the statistics produced by ONS and DCLG, so there is no need to add a further 120 homes; the GBC Affordable Housing Policy H2 proposes that all development sites (other than the very smallest) will be required to have 40% of affordable housing, so there is no need to add another 31 affordable homes per annum. Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

I OBJECT to the impression created in the Proposed Submission Local Plan that GBC’s housing targets are needed to fulfil NPPF requirements or because of central government policy, when in fact the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely a choice made by GBC.

I strongly OBJECT to fact that the method used by GL Hearn to identify the number of new homes required remains out of the public domain – this to me is a serious with holding of information which makes the whole draft Local Plan unsubstantiated, if not just plainly incorrect!

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12094  Respondent: 8848641 / Helen Feary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion s2

After more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version. At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the
country. These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. Accordingly I OBJECT to the Proposed Submission Local Plan.

I trust that you will take my views into account, and I would appreciate acknowledgement of receipt of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt". I fully and support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I is also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics ("ONS") are projecting a population increase of some 15% for Guildford Borough over this same period.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3208  Respondent: 8850433 / Ian Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not share the same vision for the future of Guildford Borough as GBC, although I recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC's desire to pursue a 'Forced Growth' policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets - the proposed 25% increase in housing stock in particular - create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that "We will continue to protect the Metropolitan Green Belt" does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16295  Respondent: 8850689 / J Reardon Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Brownfield sites: These sites MUST be developed ahead of Green Belt sites. I am very concerned that GBC appears to be considering developing Green Belt sites ahead of brownfield sites in the borough. In particular, there is brownfield land available in Guildford Town Centre which is being targeted for commercial development rather than housing. This is wrong and urban brownfield/derelict land should be used for housing instead of yet more retail/commercial space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16297  Respondent: 8850689 / J Reardon Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please understand that I am not against development and new housing, particularly affordable housing for young families and I understand that there is a real, tangible problem in the country as a whole with housing stocks. However, all development must take place in a balanced and sustainable way and the answer is NOT to identify Green Belt areas near to London which it would appear are "easy targets" for developers. This is the lazy option and is what GBC appears to be doing. The Local Plan MUST take into account the view of local residents and the GBC councillors would do well to remember that they are elected by residents and that they work for the residents whom they should try and represent at all times. To me, it certainly feels that this latest version of the Local Plan is being "bulldozed" through and I would sincerely hope and request that GBC listens to its electorate and responds in a constructive, responsible and ethical way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13396  Respondent: 8850817 / Sandra Woods  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16372  Respondent: 8850881 / N Reardon Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Brownfield sites: These sites MUST be developed ahead of Green Belt sites. I am very concerned that GBC appears to be considering developing Green Belt sites ahead of brownfield sites in the borough. In particular, there is brownfield land available in Guildford Town Centre which is being targeted for commercial development rather than housing. This is wrong and urban brownfield/derelict land should be used for housing instead of yet more retail/commercial space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I oppose the proposal to build 13,860 houses across the borough as a whole because:

- This figure represents a 25% on housing numbers (based on 2011 census) and is therefore significantly higher than the housing projections of 15% growth and not necessary. I understand that some development is required and desirable but see no justification for building on the green belt and certainly no need to build on the green belt above the current growth projections.

- GBC is allowed to apply constraints to reduce the housing projection figure (i.e. the 15%) based on factors such as Green Belt, which clearly applies in the Guildford Borough. I do not understand why these allowed constraints have not been applied given GBC’s pledge to protect the Green Belt and the overwhelming views of residents during the 2014 consultation regarding development of Green Belt.

- Whilst there is a need for some development and particularly for some affordable houses to be built, without a way of stopping owners of affordable houses from extending their properties (and therefore removing them from the “affordable houses” bracket), the whole cycle will start again in 20 years’ time and there will be need to build on more of the Green Belt. There is no need for more 5 bedroom houses in these rural villages and when you are talking about building on a scarce resource, you need to ensure you only build what is needed. This plan includes the building of “affordable houses” in villages such as East and West Horsley, where the term is frankly laughable. These will not be affordable homes.

- The calculations to produce the number of houses required have not been made available to the public and have not even been scrutinised by GBC. I fail to understand how GBC can be putting forward these numbers without being able to confirm that these figures are accurate. Local Government should be transparent and accountable to the taxpayer, but for some reason, GBC clearly considers itself exempt from this. GBC’s integrity is undermined by its inability to show its residents how it arrived by these very important figures and it’s patronising to your residents to suggest we don’t need to know.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6503   Respondent: 8850977 / Sam Pinder   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Specifically in West Horsley, I oppose the proposal to increase housing numbers by 385 or by 35%

- It’s not clear why West Horsley is being picked on, with such a massive increase in housing numbers. However, it’s obvious to everyone that if you take a village with only 1,111 houses and put another 385 houses there, this will significantly change the character and look of the village from what currently makes it such a desirable place to live. Everyone understands that more housing is needed and that all parts of the county need to take their fair share but it’s not morally acceptable to put so much of this housing in one small, rural village. This represents a percentage increase of 35%, far greater than any other single area within the borough, yet in the introduction to the DLP, GBC has specifically said what a lovely place to live Surrey is and how important it is to protect this and referenced its Areas of Outstanding Natural Beauty. West Horsley has the AONB within its boundaries and is so rural and unspoilt it seems madness to give this small village the largest percentage of houses across the borough.

- Note to the Planning Inspector - I would ask that the Planning Inspector takes a drive through West Horsley to understand its character (small, rural village, 89% of it is in the Green Belt, no Post Office, one village shop which has been sold and is likely to be gone by September) before taking a decision regarding the proposed development areas for West Horsley. Whilst I appreciate you cannot visit the whole of Surrey to consider this, West Horsley has been given an exceptionally high percentage of the proposed housing, far higher than any other village and more than 3 times what was
being suggested for Guildford Town Centre. It is important you understand what you are signing off and what you are
ruining and the only way you can see this is to see for yourself. I do not see how anyone could allow for such a heavy
burden to fall on one small village when compared with the allocation elsewhere across the borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/12850  **Respondent:** 8851233 / Helen Bayes  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**I object to the borough housing targets set out in Policy S2**

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the
Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have great concerns about the enormous scale of this building programme, which represents a net increase of 25% in the
housing stock of Guildford Borough, an increase which in my opinion is unsustainable and will be environmentally
disastrous. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are
projecting a population increase of some 15% for Guildford Borough over this same period.

I fully endorse the comments of the East Horsley Parish Council that the assumptions are flawed and that GBC’s target is
in fact a ‘Forced Growth’ policy.

I personally do not support this ‘Forced Growth’ policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/2553  **Respondent:** 8851233 / Helen Bayes  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils
have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes,
will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office
for National Statistics prediction for the growth of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/2289  **Respondent:** 8851905 / Jonathan Mitchell  **Agent:**
For the assessed need to be considered objective the underlying demographic and economic model assumptions should be made available.

The effect of students on the figures should be considered separately.

I would expect the number to be revised following the result of the EU referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6596  **Respondent:** 8852001 / SJ Haines  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 Borough Wide Strategy

GBC planis based on 25% required increase in housingstock where as ONS forecast an increase of 15% over this period. GBC appears to double count the new affordable housing needed in the borough so in effect adds at least 8% to their overall prediction. I OBJECT ON THE GROUNDS THAT THIS STRATEGY AS TO WHAT LEVEL OF HOUSING IS REQUIRED IS FLAWED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/3093  **Respondent:** 8852289 / John F. Wood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed density of houses, which is much too high. Our villages are rural settlements, not inner city suburbs, such as Wandsworth or Clapham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The removal of the development in the Flexford/Normandy area is to be welcomed (see page 22). The tables on page 30 show a welcome reduction in the number of additional homes, but appear to just be "putting off the evil day" by reducing the numbers in the short term, but increasing those further down the line - in my view Guildford does not need to expand to this extent, which will fundamentally change the borough and put ridiculous pressure on an already overstretched infrastructure. Guildford has long been a commuter town for senior staff from the City of London, but the impact of Brexit is likely to reduce the workforce in the City, and hence lower demand for substantial properties in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Devils are in the detail, many of them are easy to spot but none of them seem to be 'covered' in the proposals I have seen. Please start from a position where the full infrastructure improvement details are worked out, with the funding guaranteed, and then work out how many homes can be supported. Don't just madly throw up houses on any piece of Green Belt land and hope that the rest can be bodged up somehow afterwards

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to all proposals to build on the Green Belt at Send, Ripley and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all proposals to build on the Green Belt at Send, Ripley and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send and Ripley.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13853  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13854  Respondent: 8854785 / Desmond McCann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13856</th>
<th>Respondent: 8854785 / Desmond McCann</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is <strong>Sound</strong>? ( ), is <strong>Legally Compliant</strong>? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2844</th>
<th>Respondent: 8854977 / Susan Lukey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is <strong>Sound</strong>? ( ), is <strong>Legally Compliant</strong>? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>We love our Guildford and the Borough Council is showing an appalling lack of consideration for the residents. It's up to you to represent us and stand up the central government to convince them that Guildford is not the right place for large development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10583</th>
<th>Respondent: 8855969 / Jonathan Murphy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is <strong>Sound</strong>? ( ), is <strong>Legally Compliant</strong>? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of &quot;About Guildford&quot; (published by the Council) on page 5 states that &quot;... the Plan rejects any schemes that would have a detrimental impact on the green belt.&quot; This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10590  Respondent: 8855969 / Jonathan Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered; proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisely Airfield (A35), Garlick's Arch (A 43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2375  
Respondent: 8856001 / Martin Champion  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The SHMA predicts a growth of some 25% in the housing stock over the plan period. This far exceeds the population increase envisaged by the ONS, which is nearer 15%. GBC has not published the basis for the SHMA calculations, but in view of the large discrepancy with official figures there is reasonable doubt that the figures used to inform the LP are accurate. It is more likely that they are excessive and that the real demand for housing will be significantly less than assumed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6117  
Respondent: 8856033 / John Turner  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the disproportionate amount of development in one area of the borough
2. I object to the limited consultation period
3. I object to the last minute inclusion of new sites with less than 2 weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14537  
Respondent: 8856961 / Ronessa Hunt  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to object to the local plan.

There are many areas of the plan that concern me but the complexity of the process naturally works against the average person in the street like myself. It is hard not to conclude that there is not some method in said process in that regard.

On that basis i cannot fight all the points. So i will list some concerns that i see in my domain but i would register here that they likely apply across all areas affected by the plan.

So there you have it and quite frankly i have not even mentioned Brexit and the likely implications on population growth. At the very least a pause is required to watch the impact over the next few years but again i object because the Plan seems flawed at many levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16933  Respondent: 8857185 / Tim Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The amount of housing being proposed in one area of the borough, which is disproportionate to the entire borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17753  Respondent: 8858113 / Ramsey Nagaty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The scale of the housing number proposed in this plan, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 5,000 homes over the plan period, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I am gravely concerned that GBC have failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the proposed local plan appears out of date and based on old thinking. Current trends in terms of property development such as the marked decline in town centre shopping centres with increased internet procurement and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked. The budget for infrastructure requirements is just not available and development on the scale proposed will create gridlock and companies will leave the area due to the traffic congestion and added pollution arising as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17759  **Respondent:** 8858113 / Ramsey Nagaty  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.
The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. A further study is attached which is included within this section by reference.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.
Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. We have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in **exceptional circumstances**, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17760</th>
<th>Respondent: 8858113 / Ramsey Nagaty</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

**THE NEED TO APPLY CONSTRAINTS**

I object to the Local Plan in its failure to apply constraints.

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

4. “Many people contact me about development on the Green Belt, particularly when it on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development.

National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development.

Planning policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect
valuable local green spaces. The Green Belt now also enjoys greater protection against erosion from caravan and traveller sites.

I am proud that the Government has also abolished every single one of Labour’s top-down Regional Strategies that sought to remove the Green Belt around 30 different towns and cities. Latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989.

I further welcome plans to ensure that planning permission is in place on 90 per cent of suitable brownfield sites by 2020. This will ensure that development is prioritised on brownfield sites rather than at the expense of our countryside.

June 7, 2016 Brandon Lewis"

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17795  Respondent: 8858113 / Ramsey Nagaty  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. **The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 other than proposed sites have, despite the high level of objections, become Strategic Sites!**

There is no need for housing on these sites because the local plan housing target is incorrect and inflated and ignores constraints.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

6 POLICY S2 PLANNING FOR THE BOROUGH

6.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

6.2 The OAN “objectively assessed need” figure of 12,426 is far too high

6.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

6.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

6.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.
6.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

6.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

6.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

6.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

6.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

6.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

6.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

6.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

6.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

6.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

6.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

6.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

6.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say
that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

6.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

6.20 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

6.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

6.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

6.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

6.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2415  Respondent: 8858433 / Eric Peters  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough Wide Strategy

I object to the proposal to build 13,860 new homes:

The projections for economic and population growth should be revised downwards especially in view of Brexit.

The West Surrey Housing Market Area is too small and adjacent districts of Rushmoor and Mole Valley are outside the area. The area is artificial and the absence of a suitable alternative doesn't make 'West Surrey' reliable. There is a highly lopsided distribution of proposed developments in Surrey.

The assumptions and calculations are hidden and are using a model belonging to consultants that are openly pro development.

The plan fails to set a housing target of new homes or explain how this relates to housing need. It exceeds the 13,860 total.
If a lower number were proposed it would remove the need to build on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am writing in response to the document referenced above ("the Document") issued by Guildford Borough Council ("GBC") for public consultation. While I recognise and accept that some development should happen, I consider very strongly that development should be in proportion to population needs, in keeping with the areas in which it occurs, and carried out in a way which benefits the areas concerned rather than having an adverse impact on those areas.

I would particularly like to address the following items included in GBC’s Document:

The policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013 – 2033 period of the Document. This is 693 new homes per annum and represents a net increase of 25% in the housing stock of Guildford Borough. This appears completely disproportionate given the Office of National Statistics is projecting a population increase of 15% for Guildford Borough over this same period. For West Horsley, the proposals would represent an increase of 35% on existing households which is greater than any other area within the borough.

Further, given the recent Brexit vote there is undoubtedly huge uncertainty over the extent of population growth in the medium term. The population growth figures were produced before the Brexit vote. It is unlikely that there will be any clarity at all on the medium term impacts of Brexit on housing need for a few years. It would therefore seem far more appropriate to adopt a flexible approach to development over the next 15 years, with some development immediately to address known housing needs and a more staggered approach to development over the medium to long term so that the development can more accurately meet the need. This would be far more preferable than huge scale development now which ultimately simply isn’t required.

I consider development over the period of the Local Plan should at the most be commensurate with the overall projected growth for the borough however this should be managed in a flexible manner, with a ‘softer start’ than the Plan proposes, given the very significant uncertainty in the medium and long term population projections caused by the Brexit vote. I also urge GBC to ensure new development in any given village is proportional to the Borough’s need and in keeping with the existing environment, rather than disproportionately over or under developing in any given village.

I object to the housing targets set out in Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10382  Respondent: 8858881 / Stephen Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2) as this is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite significantly.

The housing number appears to be based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. Guildford is in the London commuter belt and part of a far wider and more complex housing market. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial as are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

As a business owner as well as resident, I recognize the need for affordable housing but the Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability and so will not benefit my staff or the local economy. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10169  Respondent: 8859553 / Clare Bevan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The Local Plan places growth above: the ongoing viability, character and “liveability” of many villages within the Borough; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10173  Respondent: 8859553 / Clare Bevan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

7. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16318  Respondent: 8859585 / Claire Yates  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to 485 houses (the total of houses proposed) being built in Send, as it would mean a population increase of nearly 25%. The impact of these developments would have a detrimental impact on those living in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12347  Respondent: 8860161 / Pat Short  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to 485 houses (the total of houses proposed) being built in Send, as it would mean a population increase of nearly 25%. The impact of these developments would have a detrimental impact on those living in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the limited consultation period, especially to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17063  Respondent: 8860833 / Stephen Compson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object to the inclusion of the Wisley Airfield and Garlick Arch/ Send Marsh sites as housing development areas in the local plan. Both sites are clearly designated as Green Belt and designed to stop the ribbon development of Greater London down the A3 all the way to Guildford. The addition of 2100 accommodation units at Wisley Airfield and a further 400 at Send Marsh would add an unacceptable number of vehicles onto an already overcrowded road network in the area. The A3/M25 junction is routinely at a standoff particularly when the M25 has a traffic jam on the Leatherhead to Woking section of the motorway. Ripley is also a bottleneck and the centre would clog up with the additional traffic. I am not sure how the addition of an additional slip road off the A3 would do anything apart from making the situation worse in Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2204  Respondent: 8860897 / Julia Shaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

I OBJECT to this policy.

13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA). It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside. The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

I have 5 objections to the proposal to build 13,860 new homes:
1. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, leading to reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

1. I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

2. The OAN “objectively assessed need” figure of 12,426 is far too high.

3. I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

4. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

5. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

6. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

7. A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

8. The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

9. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

10. The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

11. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

12. The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

13. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the
demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

14. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

15. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

16. Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

17. I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

18. GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

19. GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

20. House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

21. “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

22. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

23. This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

24. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the boundaries for both East and West Horsley being extended, thus encroaching on the Green Belt. This, despite GBC's statement that it will 'continue to protect the green belt'.

1. I OBJECT to the number and density of dwellings being proposed for the Horsleys. The number of dwellings will significantly increase the size of the villages which the infrastructure is unable to support. The density of the proposed dwellings is also out of keeping with the scale of the rest of the villages and is detrimental to their rural and historic character.

1. I OBJECT also to the proposed development of the Wisley airfield site. This is a totally inappropriate development within the Metropolitan Green Belt area which should be protected. The need for 2000 dwellings has not been justified and will place untenable strain on local services which has been well documented.

In conclusion I urge that the character of the Horsleys and above all the Green Belt should be protected as they currently stand. We owe it to future generations to preserve them. We will not know what we have lost - one could say 'squandered' until they have gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly, in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations.
I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17627  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have major concerns about this proposed development. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East and West Horsley.

I object to the proposed development site A35, former Wisley Airfield, due to its adverse impact to the local community and surrounding green belt countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1682  Respondent: 8865697 / Robert Treble  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to the number of houses identified for provision during the plan period.

Our objection is mainly based on two considerations:

- The total number is based on a flawed Strategic Housing Market Assessment (SHMA) for Guildford. The major contributors to the inaccuracy in the numbers are: perceived errors in the net migration figures for the borough; the inclusion of student housing needs which are already accounted for elsewhere in the calculations; inconsistent use of data from disparate sources to calculate the homes needed to support job growth. The detailed argument for this is to be found in Neil McDonald's report of June 2017 entitled "Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA".

- The total housing number resulting from the flawed calculations is then used without any constraints. It is our contention that the target number used should have constraints applied in correcting Objectively Assessed Needs (OAN) to take account of Green Belt, infrastructure and other relevant issues.

Since the target numbers for housing requirements underlie most of the other policies in the proposed Plan, doubts concerning their accuracy mean that much of the current document remains suspect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14841  **Respondent:** 8865985 / Grant Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. Given the result of the EU Referendum this now needs to be reconsidered.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new
housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1345  Respondent: 8875233 / Richard Hiam  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I open my response by stating that over 20,000 responses were received by you objecting to the 2014 draft plan, and therefore I object that this plan is not materially different, and that the Consultation Process has not been properly followed. I object to building on the Green Belt because its essential characteristic is its openness and permanence (National Planning Policy Framework paragraph 79). I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels - roads, schools and doctors will not be able to cope. In the case of roads, the volume of traffic which currently uses the A247/The Street at peak times makes exiting both from Oak Grange Road and from Clandon Station a difficult and often hazardous occupation. The road itself is narrow in parts, and absolutely not suitable for large vehicles. Yesterday a significant jam was caused by two such vehicles endeavouring to pass each other. The pavement was mounted, emphasising the danger to pedestrians that such vehicles present on this road. The damaging and dangerous effect of the increased volume of traffic which will use the road as a result of the appalling plan that has been presented does not bear thinking about.

I object specifically to proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being swamped by a sprawling urban environment four times its size. I object also to all other strategic sites in the Local Plan. Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are wholly out of proportion to the surrounding area and none qualify for the exceptional circumstances required for them to be taken out of the Green Belt. Therefore

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke
to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Cladon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Cladon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the number of houses 693 proposed, to be built per year, as this is more than double previously stated in plans, what evidence is the evidence for this? I object to the fact that 23% of proposed new housing is to be in Ockham, Ripley and Horsley and 65% of that is to be on FWA, this historic village of 157 residences in Ockham, would be subsumed by over 2000 new urban styled homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2338</th>
<th>Respondent: 8876673 / Tony Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S2 Borough Wide Strategy

I OBJECT to the proposal to build 13,860 homes in the Borough over the Plan period which leads to a necessity to build in the Green Belt.

The figure of 13,860 has not been properly scrutinised and is based on calculations carried out by consultants whose assumptions are kept secret and are not therefore open to debate. Guildford Borough has 89% Green Belt and a woefully inadequate infrastructure but these constraints on development are completely ignored in setting the figure of 13,860 homes. The figure also ignores homes for which planning permission has already been granted and expected windfall sites.

Since the projected need for new homes is based to a large extent on projected immigration during the Plan period, the figures clearly need to be revised following Brexit.

Many of the new homes are said to be required to accommodate projected student numbers. The University already has planning permissions dating back to 2004 which it has failed to utilise. If accommodation was built in accordance with these existing permissions and if underground car parks replaced surface car parks, students could be accommodated on the university campus and not only would the need for development of Blackwell Farm become redundant but large numbers of affordable homes in the urban area of Guildford would be released where they are most needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/994</th>
<th>Respondent: 8876993 / Robert Spackman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I have reviewed the Guildford BC plan and attended the open evening at East Horsley Village Hall. I find several matters contained therein unacceptable to me as a resident of West Horsley.

BREXIT: Since the publication of the Guilford BC Local Plan the nation has voted to leave the EU. As a result the number of migrants to England will be substantially reduced. This means that the proposed number of houses to be built within the borough are inaccurate and most probably an overestimate of the numbers that will now be required. The local plan is in effect void and should therefore be put on hold until the negotiation of UK's exit from the European Community has been completed and the future migrant policy and immigrant numbers known.

I therefore object to the proposed numbers of houses GBC are planning.

The National Planning Policy Framework (NPPF): This national policy requires GBC to address and take into consideration the character of our village, West Horsley, and see that future expansion does not spoil the existing quality of residential surrounding in which we live. The proposed density in all the areas on which housing is proposed is totally out with this national policy.

I therefore object to the proposed numbers of houses GBC are planning.

In conclusion it would seem that the estimated requirement numbers for housing are based on an out of date European position and assume that Guildford needs to expand industrially or commercially. That is not the case, Guildford is a viable borough as it stands and its residents would be better served by building starter homes and flats in the centre of the town of Guildford itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8369  Respondent: 8878241 / Janet O'Hara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough–Proposed Submission Local Plan: Strategy and Sites June 2016 Consultation - OBJECTIONS

I am writing to you with objections in regard to the above and request that the following points be taken into account when you are considering the matter.

I have lived in West Horsley for over 20 years and therefore the majority of my comments relate to the specific issues for this particular village.

The points made in this letter are in addition to the points made by Porta Planning in their separate submission on behalf of myself and a group of neighbours.

Density, Quantity and Location of Proposed Homes in West Horsley:

  • I appreciate the pressure on Guildford Borough Council to adopt a deliverable Local Plan for the Borough for the plan period but believe that such housing provision should ideally be located on existing brownfield sites and be located as near as possible to the centres of employment, such as Guildford. The Green Belt is a
defining character of Guildford Borough and there should be an insistence that it must be protected as once the Green Belt has gone it can never be reinstated.

- The existing village settlement of West Horsley consists of 1,111 homes, currently low density housing with a considerable range of ages and housing styles. The density of the proposed developments with 385 homes proposed on the four Parish sites within West Horsley and 100 homes proposed on a fifth site in East Horsley, but abutting the West Horsley Parish boundary, will be significantly greater than anywhere currently existing. The Local Plan will considerably enlarge the two village Settlement Areas, as defined in the GBC Local Plan 2003, and the quantity of proposed homes in West Horsley combined with its increased density, is completely out of character with the existing village, where a density of 10 – 15 homes per hectare is much nearer to the norm and more appropriate. **I therefore OBJECT to both the quantity of homes and the density proposed for West Horsley in the Guildford Local Plan.**

- No sound reasons have been given for the proposed changes for extending the boundaries of the Settlement areas of both East Horsley and West Horsley, which seem to be at the whim of local land owners who are clearly prepared to sell for a traitorous profit and thereby increasing the land available within, and adjacent to, the settlements for the proposed and future additional developments.

- The scale of the increase in proposed new houses, which is an increase of up to 35% on existing West Horsley households, is greater than any other single area in Guildford Borough. This inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant’s mathematical model. This consultant’s model is not revealed in the plan, nor, apparently, has it been revealed to GBC. However, this SHMA target for housing number has then been taken without question and further increased by GBC to give a proposed population increase which is almost 70% higher than official national estimates for population growth in the Borough. **I therefore question whether the SHMA is sound and OBJECT to the housing numbers proposed within both the Borough generally and specifically in West Horsley.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7153  Respondent: 8881345 / Lynne Ground  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10714</th>
<th>Respondent: 8881633 / Gwyn Keepence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>The total number of the proposed new build houses in West Horsley amounts to an increase of 35%. The need for such a massive increase has not been demonstrated. There is no indication of any formula used or assumptions made. In the absence of such it looks someone’s best guess. It would destroy the character of this beautiful village which all parties have a duty to preserve.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2702</th>
<th>Respondent: 8881665 / Mike Forster</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3548</th>
<th>Respondent: 8881825 / Siobhan Collins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I wish to register my objections to the Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the size of size of the development proposed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The need for the 13,860 new houses proposed is not supported by research or scientific study. In fact the figures supplied by the council appear flawed in many respects and to this day serious questions are yet to be answered on the validity of the model used to calculate the area’s housing need.

I am especially concerned about the damage that will be caused to small local communities, in particular, West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. These villages have a rural character with low density housing, which should be protected to differentiate the countryside from the town. The number of new houses proposed for these villages is out of all proportion to the existing settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13049</th>
<th>Respondent: 8881985 / David Hunter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We wish to object to the Local Plan for the reasons as issued by the Guildford Residents Association (GRA).

We wish it to be noted that from a cynical point of view, it could be a means of reducing appeals on Planning Applications and hence a reduction in the legal costs of Appeals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6800</th>
<th>Respondent: 8882305 / Jill Ryan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

It would appear that the only people who would welcome these proposals will be the developers who will see the opportunity to make a 'quick buck' by building on easy green field sites with no thought beyond for the community or the environment - please do not let this happen in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7296</th>
<th>Respondent: 8882881 / Andy and Sandy Homewood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
BROWNFIELD AVAILABLE

There is brownfield land available in Guildford town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5741  Respondent: 8883841 / Pamela French  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to the Borough Wide Strategy

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16612  Respondent: 8883841 / Pamela French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3745  Respondent: 8885217 / Rupert and Claire Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2  Sustainable development.

Expansion of our village is unsustainable. We have only one small shop, no post office and a very limited weekdays only bus service. In the 28 years we have lived here, the post office has closed, the local grocery shop is likely to close and there has been a corresponding increase of traffic.

The proposal for 385 properties on the proposed sites is at a much higher density than at present. The number of residents would increase putting extra strain on local services such as roads capacity, drainage, shops parking in East Horsley (both for the station and shops) and schools.

There does, however, continue to be a need for smaller properties as older people want to downsize within the village and young people want to buy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11150  Respondent: 8886945 / Brian Osborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2.

I object to the proposed housing figure for the Local Plan to build 13,652 homes at 693 DPA for next 20 years (2013-2033). The housing figure for this plan is unsustainable and the plan does not apply constraints. Local infrastructure will not cope. Paragraph 4.1.12 of the proposed submission Local Plan acknowledges that the number of houses is greater than required. Representations made on behalf of Send Parish Council by Tibbalds Planning and Urban Design consultants illustrate how allocations are made to provide 910 Dwellings Per Annum (DPA) or 131% of the requirement of the SHMA.
According to NPPF guidance Paragraph 47 stipulates that planning authorities should provide for an additional buffer of between 5-20% and based on this advise the figure would be in region of 727-832 DPA. The provision in the GBC Local Plan to build 910 DPA is therefore excessive.

Without applying constraints the housing figure could rise even higher than 13,652 houses when windfall sites are taken into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14183  Respondent: 8887009 / Jacqueline Weller  Agent:

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I OBJECT to the borough housing targets set out in Policy S2 – I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period, which could be challenged further given the results of the recent referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am writing to OBJECT to the Proposed Submission Local Plan and the evidence and assumptions which support it.

My comments on the particular points are as follows:

**Policy S2: Borough Wide Strategy**

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I OBJECT to the borough housing targets set out in Policy S2 – I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period, which could be challenged further given the results of the recent referendum.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4777  Respondent: 8888289 / Hazel Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to various proposals for the above Plan. The size and complexity of the Submission Local Plan defies the understanding of the ordinary person like myself. So I make my objections based on personal experience and common sense as an East Horsley resident of some 30 years who values what this village offers and realises that the proposed changes will ruin its character and change it irrevocably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2928  Respondent: 8888449 / Phillip Marazzi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to comment on the amended local plan as it affects the Horsleys, and the wider area including Wisley airfield and Merrow.

I remain horrified by the level of planning that is suggested and the destructive effect that this will have on the local communities and environment. It appears completely unrealistic with respect to local services and infrastructure and will lead to a dramatic loss in the rural character of the villages and surrounding countryside.

My main concerns are the disproportionate number of houses suggested with the inevitable number of people and cars that this will mean. I have seen no evidence to justify this massive development and loss of protection of this beautiful part of the country. Brownfield development in other areas such as Guildford itself have not been fully exploited, and clearly should come well ahead of this rural destruction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2935  Respondent: 8888449 / Phillip Marazzi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
The prospect of a giant urban sprawl rapidly heading towards a joining of Cobham and Leatherhead with Guildford is horrific and must not be allowed to take place. The local communities will be changed and much of the character will be lost. The countryside needs protection. No one ever tears a town down to give it back to nature. We have to stop this development now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9626  Respondent: 8888961 / Susan Fortune  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in response to the recently published Local Plan. It is however disappointing to note how little, in my opinion, previous consultations appear to have affected this new Plan. While I appreciate that Guildford Borough Council must make proposals for the future, much of what is included in the presented plan would, I believe, destroy the very essence of the Borough and damage the environment for future generations rather than manage, sustain and develop sensitively. My objections are as follows:

There appears to be a continued drive to build over the countryside rather than develop urban areas. Locally it is in Guildford where there is work and where there is a requirement for affordable housing both to buy and lease, and I feel that more can be done in Guildford to maximise its potential for housing development. Building in and developing outlying villages such as the Horsleys will increase traffic, congestion and poor air quality as residents travel to the workplace and for leisure activities. Already this area, and in particular the A246 between East Horsley and Effingham, suffers from terrible traffic problems especially at rush hours when traffic is backed up at a standstill for two or three miles.

The number of proposed houses is completely disproportionate to the area. It seeks to fundamentally change the villages of East and West Horsley without any consideration for their status within conservation zones or the impact on the many Listed properties. There is also a worrying lack of thought for the impact on the infrastructure. There are no proposals to increase medical facilities or schools, to improve rail travel, including parking facilities, for work and leisure commuters, to alleviate traffic congestion, to put in place effective general drainage throughout the village, all of which cause problems already to the residents that will increase exponentially if the Plan is agreed. As I understood it the number of houses proposed in the previous plan was disputed as being well over requirement, yet this NEW Local Plan proposes even more! Factoring in Brexit, surely these figures need to be radically adjusted DOWN. I would also question what constitutes "Affordable Housing". This appears to be undefined and I have a concern that, in this area, this will not realistically be within the budget of the lower paid as we are being led to believe.

To conclude, I believe that this Plan continues to propose far greater build than is required, is unsympathetic to the area in its proposed implementation and I object to it in its present draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17572  Respondent: 8889761 / A Dougherty  Agent:
I would show below several points I wish to raise in Objection to GBC (Guildford Borough Council) Plans in regards to their proposed Borough Draft.

It is of great concern in the way GBC have complied and submitted the '2016 DRAFT LOCAL PLAN' with various late and amended submissions. It should be noted that constitutionally Councils should carry out full 'Due Diligence' prior to and during process of submitting a Local Plan, this should review and identify all potential unprotected areas for development prior to investigating protected areas, this does not appear to have been carried out in this case, as such would be potentially open to 'Judicial Review'.

GBC have not identified or made use of all Brownfield areas and potential unprotected areas which are suitable for development.

I am aware that GBC have removed previously identified potential development sites which are far more suitable and acceptable to try and substantiate other unsuitable areas.

There has been no reasoning for this and is being ignored by GBC, these potential development areas have been working with GBC for several years on these sites, however GBC have now removed them and as such GBC are not fully committed to properly carrying out full 'Due Diligence' on the 'Borough Wide Strategy'.

Specifically:

1. Existing Industrial/Commercial Premises with open Land to the side in Burnt Common - This site offered a substantial increase in Commercial area adjoining the existing as well as potential for residential development between 100-200 homes with suitable infrastructure existing

2. Land adjoining Slyfield Green - This site would both be able to sustain Industrial and Residential development to open land with already Industrial and residential adjoining. GBC also have land available to their existing industrial site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17576  Respondent: 8889761 / A Dougherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to GBC's identified housing requirement of 13860 new homes required this is not substantiated and the proposed strategy is totally unbalanced across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1364  Respondent: 8889889 / Simon Stapleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to OBJECT to the 2016 draft version of the Local Plan produced by Guildford Borough Council.

The process of compiling the local plan has caused outrage amongst the electorate. 20,000 letters were submitted in during the Sites and Strategies Options Consultation. 95% objected to using Greenbelt land. These views have been ignored and appear to go against the councillors own election promises.

The A3 / M25 is at capacity at peak times and the Highways England Agency are not planning to improve the A3 before 2020. The planned developments will only increase congestion in and around the surrounding villages. It is proposed that 65000 houses (40%of the housing proposed) is built between the M25 & Burpham and I shall concentrate on that area during this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4216  Respondent: 8890657 / David Weight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )


In response to the above plan that was published on the 6th June 2016, I would like to object to this proposal for a number of reasons:

1. The sheer scale of proposed development in West Horsley is The Plan proposes building 385 houses, which is an increase of 35%, in a short period. This is a significantly higher percentage increase in housing than is apparent in surrounding areas, is disproportionate and will damage the unique character and community of the village, irreversibly.
1. The density of the proposed development is significantly greater than anywhere in the area currently and will considerably enlarge the two village settlements thus damaging the character of the village and causing a significant loss of The Plan does not make a responsible or reasonable justification for this level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4222   Respondent: 8890657 / David Weight   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. The proposed housing development in West Horsley will have significant ramifications on local infrastructure but when taken in conjunction with all the proposed developments, including the Wisley Airfield and the surrounding area, the vicinity will become overwhelmed with traffic. The Guildford Borough Council Highways Department and those who regularly travel in and around this area will know just how busy the local highways are currently (for example the A3; M25; A246 and many surrounding main and minor roads) and the situation will become intolerable with the additional population associated with the proposed building plan. This will also have an adverse impact on economic development through increased fuel use/cost, time wasted and lack of timely response to business needs, not to mention the adverse environmental impact. It would be far more appropriate to spend money on bringing infrastructure, amenities and services up to an acceptable level for current dwellers before building more houses. The current roadways are in a deplorable condition and will deteriorate further and faster with the increased used that the development plan would bring. It is a major deficiency of The Plan that it does not include infrastructural developments or improvements to amenities and services and so cannot demonstrate for the Authorities that there is a "Presumption in favour of Sustainable Development". The Plan is therefore flawed.

7. There is no demonstrable need for such a level of housing development in West Horsley. Our local Parish Council identified only a limited need for about twenty (20) affordable homes in the village. It is therefore questionable how such large scale housing development is justified. The numbers seem to relate more to developing a plan for the sake of a plan rather than dealing with reality.

8. Taking the whole Plan into account the number of new homes proposed to be built in surrounding villages (some 92% of the total proposed by The Plan) cannot be shown to be sustainable. This will put an intolerable strain on services and amenities which will be unable to cope as a result. Insufficient emphasis has been put on developing land nearer to the town centres which are already well served with communications and amenities. This would also help in the development of town centres which need to be able to attract more people in a sustainable way in order to aspire to be vibrant civil and commercial hubs for the area.

9. It is noted in The Plan that developers "will only be expected" to contribute to transport arrangements for their developments and regrettably this is wholly unsatisfactory as it only appears to be aspirational. You as the Borough Council must be aware of the current capacity constraints in the area and so any housing development MUST take due recognition of this and work on solutions to the difficulties that will be created. In fact there seems to be no mention of this in written policies and only vague statements within the Infrastructure Polices section of The Plan. Overall there is no specified or coherent plan to develop services and infrastructure contained within The Plan and this is a major confounding factor.

10. Another major confounding factor of The Plan is that it was developed at a time when the UK was a Member of the EU. Since its publication circumstances have changed such that it will likely have a profound effect on the need for housing in the UK (witness the current failure of numerous commercial building funds). The Plan should be put into abeyance until the situation is has been clarified.
Overall The Plan does not coherently or practically address housing needs in West Horsley and appears to be driven by a requirement to have a plan in place rather than respecting the need for considerate and sustainable development. No compelling need is shown to inset Green Belt land for the purpose of building new houses, particularly at the level proposed; not enough consideration is given to brown field or other suitable sites nearer to towns where communications are vastly superior compared to the outlying villages; no consideration seems to have been given to developing the appropriate infrastructure and services which is a sine qua non when considering increasing the population of any settlement and the Key Evidence document "Guildford Borough Economic Strategy 2013-2031" makes no rational case for locating large numbers of homes in West and East Horsley or neighbouring villages

I wish to object to this plan for the reasons stated above and furthermore believe that in view of the UK withdrawal from the EU The Plan should be put into abeyance until the situation is clarified and revised accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6230  Respondent: 8890689 / Christopher Day  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do accept that people have to live and there is a need for a certain amount of new Housing but the levels and manner in which it is proposed is completely wrong unjustifiable and unacceptable for an area like the Horsleys – I therefore object to the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10188  Respondent: 8890753 / Jan Messinger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The leader of the council Paul Spooner makes reference to "The borough of Guildford is a very special, beautiful place for all who live and work here"

They are also my thoughts too. I would like it to remain like this for generations to come. However I do not believe this local plan upholds this sentence in the opening paragraph.

I therefore object to the predicted housing numbers required by 2033. We have an ageing population as is stated in your documents. Yes we do have young people too. I have four children myself and yes I am very aware of the lack of affordable properties in this borough. So yes I do support a high % of 1 , 2 and 3 bedroom affordable homes being build and would also support a high % of market homes in these bedroom sizes too. We are saturated with 4 bedroom + homes in this borough. After all people like me need to downsize too. However affordable homes at 80% of the market value this is not affordable to most young salaried people in this area.
BAE Systems Applied Intelligence Systems acquired Detica which moved to the Surrey Research Park in 1986. The company now employs 4,500 staff working at the highest level in a number of critical fields that are important to UK economy.

Guildford is a location in which there has been consolidation for the company. The Draft Local Plan now out for consultation gives us an opportunity to comment on this as an important employer in the town.

- The plan improves infrastructure and the road leading off the park is an important part of this.
- Housing of different sizes and on different tenure options widens the choice for employees.
- The need to change the green belt boundary to accommodate these proposals, although not ideal, is supported.
- We would support the Borough in the process of securing an adopted Local Plan at the earliest opportunity.

I object to the number of houses planned in the local plan
This figure has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan.

I object to 65% of new houses in the Borough being built on land that is currently in the Green Belt.
The Green Belt was set up to protect this precious land.

I object to a total of 4,993 new homes being build within 5 miles of the Horsleys.
This is the total of the suggested areas within the Horsleys, 173 (East Horsley)
420 (West Horsley) plus another 4400 at Wisley, Garlick's Arch, Send Marsh Burnt Common, Ripley, Gosden Hill Farm, Merrow Lane.
It will ruin the rural nature of the area forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16571  Respondent: 8892193 / Kath Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Nearly 5,000 houses will be built within a 5 mile radius of Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3280  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

All of our local Schools are already full, our Medical facilities are already overstretched and our village Parking facilities (including the railway station and local shops) are already inadequate with no space for improvement. All local roads are narrow and were built at a time when the stage coach / pony & trap were the typical mode of transport rather than today's 4x4's, long wheel courier vans and supermarket delivery vehicles. Much of the Horsleys are built on clay with the consequence that drainage is inadequate.

Inexplicably, the new Draft Local Plan (which provides for 5000 new homes within a 5-mile radius of the Horsleys) has designated Station Parade, East Horsley, as a 'District Centre' which demonstrates a complete and utter misreading of the area because there are but a handful of local shops of which some have flats above. Such a designation / classification would merely encourage future urban development.

Also of major concern is the calculation and quantification of the number of houses proposed in the Strategic Housing Market Assessment (SHMA): a target number that was generated by an external consultant's mathematical formula of which no qualification or calculation is to be made available. As if this wasn't unacceptable enough, the consultant's unsubstantiated calculation has been further massaged by Guildford Borough Council to such an extent as to provide for a population increase across the Borough which is almost 70% above the official national estimates for population growth. WHY?
Furthermore, these unquantified numbers are obviously pre-Referendum / Brexit calculations and as such now need to be recalculated if they are to be meaningful? Furthermore with Theresa May becoming the new Prime Minister, time MUST be given for her to provide a clear policy statement on her plans for the Green Belt which, hitherto, she has long sought to protect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3283  **Respondent:** 8892353 / Elizabeth Russell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Following a major public outcry, GBC’s Planning Committee rejected unanimously a recent application for this development on numerous grounds yet, for no apparent reason, it has been included in the new Draft Local Plan - a clear invitation to the developers that they should try again. This is not a NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who have already been given many additional months to refine their application prior to its rejection. It is therefore my opinion that this development should be removed from the new Draft Local Plan for all the same reasons that it was rejected by GBC’s Planning Committee on 5th April 2016. These include:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within 400m exclusion zone for The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic

- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating 2,000 dwellings within the village of Ockham's 159
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity
- Impact on listed buildings
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA
- Extreme housing density with tiny garden spaces
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16586  Respondent: 8892353 / Elizabeth Russell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please find below a series of individual OBJECTIONS which I request you take into consideration when giving further consideration to the merits of the 2016 GBC Draft Local Plan.

Included among my OBJECTIONS are the removal of West & East Horsley from the Green Belt and the unpalatable and surely unnecessary addition of 385 houses in West Horsley which equates to a staggering increase of 35% on this essentially rural village which currently comprises 1,111 homes. This proposed increase is infinitely greater than that proposed in any other village across the whole Borough and leads to the supposition that West Horsley is being discriminated against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4584  Respondent: 8892673 / Nick Forwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only 5 miles. It will in effect create a sprawl, with the merging of ‘identities’ of the surrounding villages, with no delineation between one village and the next.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. This development will have a permanent and detrimental impact on each of these communities, should this Plan be approved.
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Without major infrastructure investment which is notoriously difficult to secure or deliver the north part of Guildford Borough Council is not a realistic area to propose the development of large amounts of housing.

Town centres have always provided the best opportunity for sustainable development and large areas close to the Guildford's centre have low density poor quality commercial development which could with relatively little investment in flood defence be resolved and/or commercial use retained at ground floor level.

The population growth projected in the plan assumes an ever upward trend of numbers and household formation and aims to meet that demand whatever it might be. The underlying calculation has not been made available for scrutiny. Resources including land are finite and as well as housing the planning system is required to provide a sustainable environment for Guildford and the surrounding authorities and especially London including the need to provide open space and relief from the urban environment. The requirements the Green Belt fulfils have been entirely disregarded in formulating this Development Plan and the Green Belt is seen as an obstruction rather than its usefulness weighed against the requirement to provide housing.

The densities proposed for the large sites are not realistic and will as they do in every Local Plan fall short once internal site roads, open space and other needs are designed in.

The Local Plan as drafted is, as ever, driven by politics rather than planning and simply places unwanted development as far from the County towns as possible and is designed to fail and throw the burden of deciding where housing should be built onto the Planning Inspectorate. In these circumstances where the plan is unsound planning will be uncontrolled and by exception and it is inappropriate to expose land with such poor surrounding infrastructure to this unplanned approach by removing its Green Belt designation.

The laissez fairs attitude to investment in road and flood protection infrastructure has now taken up all available capacity outside of the large and small town centres in Surrey and it is extraordinary that the Local Development Plan has such limited proposals for the upgrading of that infrastructure.

The Local Plan is in my view unsound in that it will fail to deliver the housing provision it proposes and in such circumstances removing land from the Green Belt without a method of making it deliverable or weighing its existing benefits against other needs is unsound and bad in its proposal process and bad at law and fails to meet the test of an "exceptional circumstance" to remove land from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to complain about the housing being increased in Guildford by 693 homes a year. This figure is far too high and I have not seen any evidence to justify it (if there is some please provide it in a form the general public can understand).

The university has not fulfilled any of its obligations to the town. Students rent all the available homes for 30 weeks of the year when they should be available to local families all year round. The university has space to increase its campus but has failed to do so.

Please take notice of the views of Guildford residents who want to live here with their families and not be forced out by developers who are going to make a fast buck and get out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy S2 Borough Planning

I Object to this as the number of 13,860 homes proposed has not been scrutinised despite apparently frequent request being made to account for this unsubstantiated number which will require major structural changes. If these only met housing needs it would not be necessary to encroach on the Green belt. This is also pre-Brexit data: These should also be looked at in the light of Brexit, possible (probable) slowdown of growth of the economy, people leaving Britain and less migration. The future is uncertain, traffic problems are already dire in and around Guildford,

This number also apparently refers to houses for 'West Surrey' including Guildford, Woking and Waverley. This is Commuter belt for London. Is Guildford being asked to build houses in open countryside to cater to London and feed Woking's requirements? There must be transparency for the underlying working of this figure. The Consultants used to have a website which proclaims a pro development agenda: have these figures been inflated for profit? What about the rickety infrastructure? Rural areas will become urban. A substantially lower figure is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 **We object** to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

1.2 The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

1.3 We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

1.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

1.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.7 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

1.8 The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.10 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:
The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
1.18 Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

2 THE NEED TO APPLY CONSTRAINTS

2.1 Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

2.2 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

2.3 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements)

2.4 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

2.5 In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

2.6 This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure

2.7 It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

2.8 Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that it appears that 12,426 is based on assumptions THAT HAVE NOT BEEN MADE PUBLIC and have not been modified or corrected in the SHMA. (Professional analyst Neil McDonald of NMS5 feels that annual housing initially of 400 per year should meet the overall need in Guildford). In order to allow for the infrastructure to be improved and for this to be carefully monitored open ended targets with unknown figures held back until after the plan period is a postponement not reduction and does not allow for proper planning and is not TRANSPARENT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12601  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed SHMA figures and support the submission by Guildford Residents' Associations which challenges the figure of 693 houses per annum. The reports commissioned by GRA and others prove that the methodology used has been deliberately withheld from public scrutiny and seems to be flawed and that such a high level of housing is justified, particularly in the light of the recent economic and political situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1536  Respondent: 8894657 / Jacob's Well Residents' Association (Janet Smith)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The JWRA object to the proposed new homes figure of 654 per annum. Although reduced from 693 the JWRA feel that such a high level of housing cannot be justified, particularly in the light of the new economic situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8395  Respondent: 8894977 / Janet Burgess  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **Disproportionate Development**

   - I OBJECT to what I see as disproportionate Regardless of the validity of the housing numbers proposed overall, the burden of development seems to fall disproportionality on the rural east of the borough. More than 5,000 of the 13,000 plus homes proposed are in, or within, 4 miles of the Horsleys/Ockham -

<table>
<thead>
<tr>
<th>The Horsleys</th>
<th>600 (including minor potential developments)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wisley Airfield</td>
<td>2068</td>
</tr>
<tr>
<td>Gosden Hill Farm</td>
<td>2000</td>
</tr>
<tr>
<td>Burnt Common</td>
<td>400</td>
</tr>
</tbody>
</table>

   - This area does not have the infrastructure (roads, rail, schools, medical facilities, drainage, sewage systems, etc.) to cope with such development, especially with the likelihood of 10,000 more cars from these proposed developments using what are already congested, mainly minor

   - The sheer volume of such developments will only add to the gradual coalescence of the London suburbs with towns, villages and other settlements in the south west of the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/732  Respondent: 8895137 / Sue A Pratt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to the new version of the plan.

It envisages an unacceptable degree of incursion into the green belt. Unless the green belt is given priority as a key contributor to the quality of life, which must be protected, it will in the end suffer death by a thousand cuts. In my view the plan far too readily extends village settlement areas without sufficient regard to the character of those villages.

The Guildford area is currently very congested and further significant building will require major infrastructure investment much of which cannot be easily funded by developers. It seems absurd to be proposing building on such a scale without more convincing detail of how the necessary resulting infrastructure can be set up.

There is a clear need for more housing, particularly small and affordable dwellings, and this need cannot be easily met but the plan displays disappointingly little imagination in devising solutions to the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3389</th>
<th>Respondent:</th>
<th>8895233 / Clare Axten</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour. I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability. The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9112</th>
<th>Respondent:</th>
<th>8895265 / Peter Wood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the lack of Proportionality: If the proposals are fully realised across East Horsley, West Horsley and Ockham, the number of households would increase from dramatically, in part due to the ridiculous high and out of character density that the plan suggests. This represents a disproportionate impact in comparison with other parts of the borough better placed to deal with large population increases. What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12136</th>
<th>Respondent:</th>
<th>8896097 / Andrew Fordham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compares with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2: Planning for the borough - our spatial development

I OBJECT to this policy.

This policy aims to add 13,860 new homes to Guildford Borough over 2013-2033. This is equivalent to 693 new homes per annum.

The numbers seem to result from a forced growth policy rather than a reasoned analysis.

Furthermore, students have not been properly accounted for, and it does not (but should) require the University of Surrey to build the student accommodation that it previously committed to.

These numbers are excessive and based upon false assumptions and using a model that the public have not been allowed full access to so that it can be properly verified.

The Council has not scrutinised them either which is an incomprehensible error. Nevertheless, from the limited information provided to some, Councillor David Reeve and Guildford Residents Association (who I believe used an independent expert) have separately identified numerous errors that need correcting and will lead to a reduction in forecast numbers.

GL Hearn subcontracted the work on the SHMA to J Gardner Consultancy and subcontracting is against the rules. I object to my money being used in this way.

Furthermore, the economic growth rate forecasts need to be revisited in the light of Brexit which is already causing an economic slow down and will change requirements significantly.

The SHMA numbers therefore need to be revised downwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1022   Respondent: 8896161 / Carol Wilson   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Constraint has not been applied to the housing numbers of homes. The rate of growth is still too great and will spoil the borough. 395 additional homes for Horsley is too high. 25% increase of the size of Guildford by 2034 is ridiculous. No account has been taken of Brexit uncertainty either.

Flawed evidence is still being used to justify over expansion. Transparency is needed.

I object to the fact that, despite some changes in sites, the east of the Borough is planned to have more than its fair share of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10838   Respondent: 8896929 / Desmond Finnan   Agent:
I object to the shear number of extra houses proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable IF the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional percentage increase is totally unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
17. I object to the Local Plan’s aim to impose massive new towns at ‘strategic’ sites. I am not against development and I would prefer that each existing town / village provide the numbers of homes required in ratio to their size. This is an organic way of growing and far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4385  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- provide primarily, sufficient housing for the needs of the local community e.g. for those children of existing residents who need to purchase locally, or existing elderly residents wishing to downsize, thus providing larger properties for other incoming families. The Draft Plan makes dubious and unsupported assumptions about housing need in this particular area (S2). The numbers proposed are much too high, and calculations dubious in the extreme, with plenty of “double accounting”. Nor do they take account of the EU Referendum result which will likely lead to better border controls. The majority proportion of population increase in the UK arises from high net immigration. “Sustainable development” means that the country needs to spread the burden, and the benefits, of increasing population across a much wider area of the country, instead of attracting yet higher density into the south-east and London. Businesses will, through market forces, move towards available labour, and government should recognise this by providing the necessary infrastructure to other areas anxious to attract better living standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4391  **Respondent:** 8897505 / Michael Dickins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- Any overdevelopment, however small, which has a density above the level already existing within the local community
- Any large new development over green belt land near the borders of greater London, such as proposed here (A36, A37, A38, A39, A40, A41) and at Wisley (A35), whether some new infrastructure is provided or not, and which will still have a devastating impact on the way of life in existing neighbourhoods, although development of some of these sites at much lower density may be acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3402  Respondent: 8898145 / Michael Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Complaint proposed to the grossly unrealistic numbers of houses intended to be built, in comparison with those already there, but having no satisfactory grounds publicized to justify swamping GBCs ability to supply adequate drainage, energy supplies, medical services or school places for the multitude of putative inhabitants.

The more I hear of the latest proposals the more concerned I become.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13608  Respondent: 8899617 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) being identified as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley, whilst at present these three Wards represent only about 11% of the existing housing in the borough. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Whilst I acknowledge that the Borough needs identify further sites on which affordable housing can be built, I believe that the proposal to build some 400+ homes in West Horsley is ill-conceived and totally disproportionate to the existing housing stock of some 1,100 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I
have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards
represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2428  **Respondent:** 8900161 / Peter Gelardi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
2. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
3. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
4. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
5. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/8386  **Respondent:** 8900481 / John Burgess  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Disproportionate Development

   • I OBJECT to what I see as disproportionate Regardless of the validity of the housing numbers proposed overall, the burden of development seems to fall disproportionately on the rural east of the borough. More than 5,000 of the 13,000 plus homes proposed are in, or with in, 4 miles of the Horsleys/Ockham -
The Horsleys 600 (including minor potential developments)
Wisley Airfield 2068
Gosden Hill Farm 2000
Burnt Common 400

- This area does not have the infrastructure (roads, rail, schools, medical facilities, drainage, sewage systems, ) to cope with such development, especially with the likelihood of 10,000 more cars from these proposed developments using what are already congested, mainly minor roads.
- The sheer volume of such developments will only add to the gradual coalescence of the London suburbs with towns, villages and other settlements in the south west of the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2659  Respondent: 8900577 / Ann-Marie Bound  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield sites in the surrounding towns should be developed before open countryside is decimated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18613  Respondent: 8900641 / Caroline Carr  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• I object to the lack of evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4247</th>
<th>Respondent:</th>
<th>8900705 / Susan Fuller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
I object most strongly to the latest draft of the GBC Local Plan.

My reasons are as follows:

The plan still proposes to inset East Horsley from the Greenbelt;

Development of 100 homes is proposed near Horsley Station;

Over 2000 homes are still proposed to be built on the Wisley Airfield site;

The village of East Horsley and its surrounding villages (West Horsley, Effingham and Ripley) simply do not have the infrastructure in terms of schools, medical facilities and transport (including rail, roads and parking) to meet such a high increased demand.

I note that 57% of the new housing proposed will be on land that is currently categorised as Greenbelt. This was promised to benefit future generations and to destroy this is quite appalling.
Following the Brexit referendum forecasts of increasing population numbers have been reduced to 10.4% for Guildford so why, in the light of this does the Council plan to raise housing stock by more than double to 22%? It is neither warranted nor rational.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8058  Respondent: 8901185 / Annette Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4366  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council Local Plan 2016.

I am once again writing with my comments about the Guildford Borough Council’s Local Plan. Certain issues must be addressed in particular for my local area, East and West Horsley.

a) The proposal to build more than 533 houses is excessive. Combined with proposals to build an enormous number of houses on Wisley Airfield, the locality will be overrun. I understand that this expected expansion of the population far exceeds the forecast rate of expansion in the borough generally. We are being unfairly targeted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4369  Respondent: 8901249 / Michael Gibbs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

h) Gradual development of the housing stock in the villages is of course desirable, and most residents will accept that this process will continue. It is the sheer scale of the proposals that are so unacceptable. The process of destroying the Green Belt little by little (large by large?) will in later generations be seen to be unfortunate, insensitive, unnecessary and much to be regretted.

I hope that my letter will be taken as constructive, and those in the villages affected and indeed all residents in the borough can in the end feel that they have had the opportunity to be heard and their views taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4109  Respondent: 8901633 / Duncan Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guilford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5678  Respondent: 8901921 / Diana Ashby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing to the North East part of the borough, with no links to Guildford or to local train stations.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be swamped by a 2,068 dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5690  Respondent: 8901921 / Diana Ashby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

13) I object to the loss of high quality agricultural land covering 63 ha which has been farmed for decades and probably centuries. The current crop of maize is a valuable resource for the country.

14) I object to the fact that the proposed plan is completely contrary to the needs and desires of local communities. The Ockham Parish Plan shows the requirements of local residents are access to the countryside and clean air and the peace and quiet afforded by wide open spaces; the historic features of the village should be maintained and the village's green spaces, including the Former Wisley Airfield, should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8147  Respondent: 8902465 / Linda Slater  Agent:
I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2884  Respondent: 8902497 / HA and J Jessett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having seen the Local Plan proposals shown by the GRA for new homes to be built throughout Guildford on greenbelt land, I am appalled. Development is always dependant on investment, but what is the point of destroying areas in such magnitude, especially without transport infrastructure. Developments of this hostile enormity can only scar the surrounding environment, robbing future generations forever. Why waste the opportunities to use brownfield development areas?

I have a deep love of Guildford Please treat our greenbelt like the fragments of a Greek vase, and control this exaggerated need for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8637  Respondent: 8902497 / HA and J Jessett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a member of Guildford Residents Association, I am horrified to learn of the threat to Guildford and the surrounding area.

Having considered the proposed developments for Guildford, it would appear that no serious consideration has been given to the ramifications that will ensue. This can only be described as a wanton attack on Guildford and the surrounding area, presented in the guise of development! I cannot agree with the proposals as they are grossly inept.

I love Guildford and it breaks my heart to see these monstrous development proposals, I should like to know what Prince Charles would say!

I leave you with these thoughts, and hope that in some small way this helps to save Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16945  Respondent: 8902689 / Lyndell Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

HIGH DENSITY OF HOUSING

I am a Guildfordian and have lived in Guildford for the majority of my life and I am appalled at the recent developments in west Guildford with particular reference to the high density of housing in the area. It seems that any available spaces, including gardens, are used for housing development. This development may advantage developers and builders, but does not enhance the character of the neighbourhood or the benefit of local residents. The area includes too many housing of the HMO type that could be used for families. Any further additional housing that may be planned can only add to the deterioration of the area.

NATIONAL POLICY

The emphasis of national policy on building more homes does not take into account local and special circumstances. Extensive development in Guildford and the surrounding areas can only lead to a lower quality of life for existing residents, higher external costs and permanent loss of the Green Belt.

On a macro-economic level, I consider that the South East region has become too expensive for large scale investment and that in future the centres for growth will be the Midlands and the North.

Projects like H2 are welcome as they should extend the commuting catchment area to London, ease congestion and encourage extensive growth in their regions.

In conclusion, I strongly recommend that Guildford keeps its existing Green Belt area and has limited development and concentrates on high value industries and services and limits housing to existing 'brown field sites'. I cannot understand how the housing target of 652 houses per year was achieved and accepted. The target should be considerably reduced to reflect the many homes occupied by students and the already congested areas within the Borough.

An alternative scenario may consider that the University has expanded too much and has outgrown the Borough. I believe it came from Battersea and perhaps should move to somewhere else.

In conclusion, I strongly recommend that the Guildford area remains Green with limited development concentrating on high value industries and services and limiting housing to existing 'brown field sites'.

Page 367 of 1722  Document page number 1068
In view of flawed new evidence, Guildford's proposal for more than 12,426 homes (plus a buffer of 1155 homes) is excessive and will result in needless loss of Green Belt and green, and increased congestion, that cannot be justified in our heavily constrained borough.

GUILDFORD'S POPULATION GROWTH

There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

CONSTRAINTS TO GROWTH

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

As a Guildfordian, I am proud of our heritage and rural situation and deplore efforts to expand or amalgamate with the outward expansion of London or the Farnham, Aldershot conurbation.

WOKING EXPANSION

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is unacceptable given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

CONGESTION

Even taking into account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period. Traffic in West Guildford is very congested, particularly in early morning and evening. It is more convenient to walk to the town centre than use a car in this period.

STUDENT ACCOMMODATION

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly. Many students occupy private homes more suited to family accommodation. In addition the accommodation of students within the community, particularly in West Guildford, has not been generally acceptable to local residents. Students are not normally considered part of the local community and some students subject residents to high levels of noise and unacceptable behavior.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
the scale of the development proposed in West Horsley, and the impact this will have on both the character of the village and on the already inadequate local infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt.
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11837  Respondent: 8903841 / Anne Tutt  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The quantity of properties proposed is vastly disproportionately high compared to the size of East Horsley, West Horsley and the hamlet of Ockham, and is therefore out of keeping with the nature of these villages. The National Planning Policy Framework requires new development to respect the density of existing housing in the area, not overwhelm it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15010  Respondent: 8904129 / Elizabeth Ross  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live...
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposals as set out in the Horsley Countryside Preservation Society newsletter to build in the region of 593 new houses in East and West Horsley. This figure does not take into account the proposed development of 2000 houses on the former Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12129</th>
<th><strong>Respondent:</strong> 8905505 / Rachel Folley</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to object to the Guildford Borough Proposed Submission Local Plan: strategy and sites : June 2016

Previously, I have sent letters, attended meetings and contributed to local information gathering and protests against the intentions of the local plan.

The National Planning Policy Framework (NPPF) clearly states that new residential development must respect the character and density of existing housing and be limited in quantity by the availability of infrastructure and local facilities.

ARE YOU NOT LISTENING ?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15063</th>
<th><strong>Respondent:</strong> 8905537 / Christopher Ross</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside.
“West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these
constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The scale of the proposed increase in the number of houses in the Horsleys is unreasonable. It is far greater than in other areas. It would be much better to expand the area of a town, such as Guildford, which would not change its character to the extent that these proposed developments would drastically change the character of the Horsley villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3672  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the scale of new building throughout the borough as unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3674  Respondent: 8906177 / Peter & Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all other strategic sites in the Local Plan - Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14990  Respondent: 8906273 / G Baptist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
The housing number is based on pre-Brexit data for economic and population growth, including migration. These need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. It will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The nearest station, Horsley, which most commuters would drive to as there is little other public transport, would be unable to cope with the increase in commuters at peak times. Even now it is now difficult on occasions to find parking at either Horsley or Effingham stations.

The existing local medical facilities will be unable to cope with the proposed increase in population. The royal Surrey Hospital would not have capacity to cope with the increase in patient numbers created by the proposed Local Plan development.

AVAILABLE DEVELOPMENT SITES

The Local Plan does not take in to account the existing sites still undeveloped within Surrey. There are Brownfield sites available, which have not been developed and would provide enough land to meet the need for affordable local housing. Many commercial sites are unused and should be developed before any planned use of the Green Belt land.

I ask Guildford Borough Council to reject the existing plan and review Brownfield sites and existing permissions for development rather than the development of precious Green field sites, which have been nationally recognised as protecting the quality of both our urban and natural environments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8109  Respondent: 8907265 / Jan Brind  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9393  Respondent: 8907393 / Helen Cannon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17852  Respondent: 8907809 / Sarah White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Emphasis should be on smaller dwellings. We do not need more four and five bedroom houses (although developers can make more profit on these). Furthermore permission should not be given to extend or knock down/replace existing small dwellings with larger buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4650  Respondent: 8907905 / G.A. Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact over existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The infrastructure/services in these villages will be unable to cope with the level of development proposed and do not meet the needs of the local communities.

The sites of Wisley Airfield, Garlick's Arch, Send Hill and Tannery Lane are in unsustainable locations. They do not benefit from railway stations that are within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles.

Greater consideration should be given to increasing the density of development in urban areas, such as "brownfield" sites in Guildford, where more practical sustainable transport options are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
There is no doubt that Guildford needs more homes, though they should be of the right kind, providing for first time buyers, genuinely affordable houses for those in the public sector and suitable homes for those wishing to downsize. The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. A reduction of around 5% does nothing to alleviate the concerns we expressed last year and we object strongly to this revised figure for the following reasons.

- Any organisation presenting a set of figures for whatever purpose should be prepared to be open about the provenance of such data. GBC has refused to give any information as to how this figure was arrived at, thus failing the requirements of open government as this extract from the opengovernment.org.uk website suggests.

"Priority 1: Extending the principles of openness and transparency.

Transparency – opening up of government data and information on areas such as public spending, government contracts, lobbying activity, the development and impact of policy, and public service performance.”

- The Guildford Residents’ Association (GRA) commissioned an independent analysis of the SHMA which was carried out by a respected national expert who worked for the government. He, with complete clarity, has concluded that an annual build of 404 houses would be sufficient for Guildford’s needs. This would give a total build of 7,676 houses over the period of the Plan. Even this reduced figure exceeds all other boroughs in the county as indicated in the SCC plan below.

[Image]

- It would appear that the SHMA figures were distorted by the incorrect recording of University students leaving Guildford at the end of their studies. The discrepancy between the two sets of figures is nearly 40%. It says something about the lack of transparency of GBC that the twenty Parish Councils and Residents’ Associations that make up the GRA were prepared to pay for Neil McDonald’s independent assessment.

An over-inflated housing need figure affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

The changes made to the Draft Local Plan do nothing to address the concerns we raised last year. You claim to have listened to local views but would seem to have done so with your collective hands over your ears. Requests for clarity in the methods used to obtain the housing needs figures have been ignored and we can only draw the obvious conclusion.

No one doubts the need for some new housing but the revised housing figure cannot be trusted, given an independent assessment that differs by nearly 40%. This one issue renders the whole Plan suspect and therefore unsustainable.
What changes (2016) / further amendments (2017) do you suggest should be made to the document?

Attached documents: [BCA_response_to_Local_Plan_2017_Consultation.docx](BCA_response_to_Local_Plan_2017_Consultation.docx) (830 KB)

---

**Comment ID:** PSLPP16/999  **Respondent:** 8909185 / Jamie Hogg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

- I object to the disproportionate amount of development this would create in one borough, where infrastructure is already creaking to cope.
- I object to the limited nature of the consultation period.
- I object to the last minute inclusion of new sites with less than 2 weeks’ notice.
- I object to the proposal at Wisley Airfield being back in this plan when it has been roundly rejected already.

What changes (2016) / further amendments (2017) do you suggest should be made to the document?

---

**Comment ID:** PSLPP16/18412  **Respondent:** 8909761 / Diana Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative,
however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guilford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9436  Respondent: 8910817 / Anne Elkington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object because it will put pressure on the already struggling main roads into London. A3/M25 junction is regularly blocked, adding further traffic will exacerbate this and lead to increased pollution levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9437  Respondent: 8910817 / Anne Elkington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the amount of houses being proposed in the areas as it would dramatically change the character of the villages, swamping Ockham with over 2000 houses is disproportionate to the existing village. Horsleys housing sites at 533 houses would put pressure on already stretched local services, there no spare capacity in schools and doctors and in car parking facilities at the stations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These sites would increase the number of homes in West Horsley by over 30% without any increase in services, and are, therefore, not sustainable.

At present the primary school is full, the medical facilities are overstretched and the railway station car park is frequently full. Thames Water has already intimated that the foul water sewage system would not be able to cope with any increase in use. Bus services in the northern part of the village are only provided during the middle of the day and are useless for those wishing to travel to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

May I take this opportunity of registering my objection to the unnecessary damaging effects of the Proposed Submission Local Plan: Strategies and Sites June 2016. The number of homes proposed is excessive and disproportionate to the character and nature of the area which clearly has not got an adequate infrastructure to meet the travel, educational, medical and shopping requirements imposed by such a high density development plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object most strongly to the proposed increase to the number of new houses for West Horsley in the Local Plan.

In doing so you will turn a small surrey village into a dormitory development to Guildford, destroying the natural pleasant environment for its present inhabitants who have accepted the policy of infilling to be in proportion to its size and to its present infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7548</th>
<th>Respondent: 8912065 / A Butler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the new draft local plan for</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 65% of new houses in the borough are to be built on land that is currently in the greenbelt</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17867</th>
<th>Respondent: 8913889 / Penny White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Why are you adding to the greenbelt in, I believe cllr spooners constituency whilst trying to take other villages out. As I have said before you should not be touching the greenbelt at all.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is a certain amount of brownfield space that you can build on. The plans for new homes, infrastructure and commercial use should be decided based on this available space. When that has been done we are full.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5091</th>
<th>Respondent: 8914049 / Diana Bridges</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no further evidence provided as to why so many more houses are required.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2564</th>
<th>Respondent: 8914049 / Diana Bridges</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the unfair imbalance of the Plan across the borough.

I do not understand why you have formulated a plan that is so very and unfairly biased against the North East of the Guildford Borough with the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan.

You propose that 40.6% (4613) of the 11350 homes should be built and be **within 3 miles of Send Marsh**, most of them on Green Belt. Guildford Borough is over 100 square miles, this is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12052  Respondent: 8914945 / Nichola Armstrong  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

S2 Borough Wide Strategy

**I object most strongly to S2**, the growth of 693 dwellings per annum (a total of 13,860 dwellings). In 2010, the growth rate was set at 322 units per annum. In just six years this number has more than doubled. I am deeply concerned that the SHMA produced by G L Hearn has not been scrutinised properly by councillors. After watching the full council meeting in May there appeared to be a difference of opinion regarding the SHMA, whether it should be taken on trust because it was deemed ‘a professional document’ or whether G L Hearn should be invited in to discuss the document. The model on which the calculations are based is not even held by GBC so is not available for scrutiny.

Policy S2 is unacceptable especially as 89% of development proposed is in the greenbelt. I live only a few 100 metres away from ‘strategic site’ A46. I think it is an absolute disgrace that councillors have not scrutinised the core evidence they have base the Local Plan on. According to Planning Policy, it is easier to develop a few strategic sites within the Borough than spread development throughout the whole Borough. This does not follow the core principles of the NPPF. It is unjust, and does not ‘objectively assess the ‘needs’ of my rural community. This is an unelected decision made by Planning Policy. There is no infrastructure in place for a monstrous development of this size.

The Plan does not have a brown site policy, Only 1760 houses will be built in the Town Centre and urban areas. Surrey University has enough land available to accommodate all students on campus freeing up homes in Guildford for families and the results of the recent Brexit referendum were not even taken into consideration. The west of the Borough is already heavily urbanised and A46 will ensure another rural village is concreted over and destroyed.

GBC have refused to listen to residents concerns. **I strongly object to Policy S2.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I don’t believe that GBC have achieved ‘…recognition of environmental constraints and the availability and viability of land for development.’ in this LP. The figure shown for the number of new houses per year as stated in this policy ‘this is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033’ is unproven as the methodology and proof behind these figures has not been shared for review. How can the OAN for housing be consulted on when we don’t know the basis on which the figures have been arrived at. The previous figure used in Guildford local planning was 322 per year and that was sufficient in 2010, but how this new higher figure has been worked out is not at all clear. The GBC needs to revise its planned housing numbers downwards, and then ask each Parish in Guildford to identify smaller, local plots, that could be developed "organically" in each parish, as well as in the town centre and especially brownfield sites, so not overloading existing facilities, rather than the "super" strategic sites." as in the existing draft plan.
It is clear that the preference for the GBC planners is to encourage a small number of big developers, who prefer large sites not on Brownfield and then to get CIL to compensate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
I object to Policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16394  Respondent: 8915905 / Rhiannon Stroud  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2 (Borough Wide Strategy)

The Draft Local Plan would see a 25% increase in the number of households in the Borough over the period 2013-2033. This is an incredible increase and I seriously question the basis of this calculation. It would appear that the consultant’s mathematical model that formed the basis of this calculation is not revealed in the Draft Local Plan. Guildford Borough Council have not scrutinised these numbers before offering the Draft Local Plan for Consultation. External consultants and members of the public have provided detailed criticisms of the model and it is completely unreasonable to be planning such a dramatic change based on highly questionable data – it is critical that there is not mistake here as once housing has been built it will not be undone.

It would also seem sensible to consider the impact of the European Referendum on projected economic growth rates and on projected migration throughout the period from 2013 to 2033. This should be assessed and the economic modelling should be repeated so that accurate data is used to calculate the impact on migration.

Guildford Borough is highly protected against development (89% Green Belt, 44% AONB and about 75% protected by SPA). It is appropriate for the Council to apply these constraints when considering their housing target as other Councils have done, but no constraints have been applied. It is shocking to think that the Borough of Guildford would dramatically change from being mostly rural and Green Belt land to mainly urban, creating a corridor of housing straight out from London. Guildford doesn’t need to build nearly twice as many large housing estates as the rest of Surrey put together!

I strongly object to this Policy and the impact it will have on communities, the environment and the character of the Borough of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4337  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7737  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The Local Plan places growth above: the ongoing viability, character and “liveability” of many villages within the Borough; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; andremedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7744  Respondent: 8916001 / Ockham Parish Council (Peter Bevan)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10360  Respondent: 8917025 / Fiona Cheese  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to this Plan which proposes that over 70 per cent of new housing be built within the Protected Green Belt. There is ample brownfield land in Urban areas without using precious protected Green Belt Land and destroying historic rural villages and agricultural land.

I object to the housing number of 683 houses per year from West Surrey Strategic Market Housing Assessment (SHMA) as far too high...

I object to the totally disproportionate allocation of housing in this particular part of the Borough. - over 23 per cent of the Plans new housing is in area of Ockham, Ripley, Send and the Horsleys... This are at present has only 0.3 per cent of the population of Guildford Borough This would be the greatest example of disruption to the Green Belt in the whole country if this development goes ahead.

Please take out all these enormous developments from the Local Plan in this area and think about keeping our villages and the Green Belt in tact...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13336  Respondent: 8917025 / Fiona Cheese  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The result of the Strategic Housing Market Assessment referred to in the proposed plan is unbelievable. Estimates that 593 additional houses are required to be built within 5 years of adopting the plan are totally outrageous. Other estimates, provided by detailed analysis using a number of different methodologies have shown that the total number of new houses required in East Horsley is in the order of 130 to 180 over the next 15 - 20 years. This is in line with population growth over the last 12 years, and takes account of the local demographic, the nature of local businesses, and the lack of students living in the Horsleys (which appear to have disproportionately influenced GBC’s calculations). Development on this scale is much more reasonable. We absolutely accept the need to increase housing stock, including the provision of...
affordable housing, but the scale of development must be proportionate and the character of any development must be in keeping with the current character of the Horsleys, which are, and should remain, within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10709</th>
<th>Respondent: 8917409 / Susan Lindsay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is an unnecessary and damaging plan to build an excessive number of large houses in East Horsley and nearby.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1427</th>
<th>Respondent: 8917665 / Frances Porter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the unfair allocation of housing it all seems to be around the smaller villages when there are large sites within Guildford that would be more suitable for development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10616</th>
<th>Respondent: 8917793 / Alan Pickup</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposals made in the New Local Plan result in 593 new houses in the Horsleys within five years of the Plan being adopted without taking account of the 2,000 houses proposed at Wisley, 2,000 houses and mixed use development at Burpham, and 400 houses and commercial development at Burnt Common and Gosden Hill Farm. In West Horsley alone, the proposal is to increase the housing stock by up to 35%! Once again, it is difficult to avoid the impression that this plan is the result of a desktop exercise prepared by individuals who have little knowledge of, or interest in, our villages. Adjustments tp population growth projections made by Guildford Borough Council result in a population increase which is almost 70% higher than official national estimates for the Borough. The adverse impact on an</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 396 of 1722
overloaded existing infrastructure in terms of local schools, medical facilities, and road and rail transport would be substantial. The impact of the resulting urbanisation of our villages adjoining the Surrey Hills area of Outstanding Natural Beauty would be devastating.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1557  Respondent: 8917793 / Alan Pickup  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The revised target for borough housing remains excessively high and is seriously flawed. I object to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6183  Respondent: 8918913 / Sarah Khadka-Lowe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

There is plenty of brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13193  Respondent: 8919009 / Andrew Kukielka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13141</th>
<th><strong>Respondent:</strong> 8919393 / Steve and Angela Gill</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the draft Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the FWA/TFM), an area that at present has only 0.3% of the population of GBC.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13532</th>
<th><strong>Respondent:</strong> 8919393 / Steve and Angela Gill</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC. I presume that this is solely because it is anticipated that the number of objections from this area will be lower than others and that a simple numbers game it being played – the less objections from an area, the more likely a development. Adopting this approach is both cynical and unbecoming of a democratically elected organization.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3520</th>
<th><strong>Respondent:</strong> 8919521 / Susan Hughes</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**POLICY S2 – Borough Wide Strategy**

**OBJECT.** I object to the huge scale of the building programme. The proposed 13,860 new homes would represent a net increase of 25% in the housing market of the Borough. That far exceeds population growth forecasts and the effect of Brexit on migration. In addition, the Council has not explained how it has arrived at this figure and so the hidden nature of any calculations used to reach the figure raises reasonable concerns about their legitimacy, especially as the new homes will involve major structural change in a protected area - some 89% Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1441  **Respondent:** 8919585 / Gareth & Nicola Owens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please find attached my comments on the current Proposed Local Plan. I recognise that a great deal of work has gone into this plan but it does seem that many of the issues I and others raised in my last submission are once again cropping up unanswered. I have used analysis from local groups to help me understand what these proposals are and often used their words when I agree with them, and not, where I do not. I would ask therefore that you consider my Objections with due weight.

POLICY S2:

Borough Wide Strategy, I **OBJECT** to this policy.

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum. This represents a net increase of 25% in the housing stock of Guildford Borough, which when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17836  **Respondent:** 8920129 / Allan Siva  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

When Guildford residents protest at proposed developments such as the re-development near the Guildford Railway station site (which would have resulted in a large number of housing needs to be met) on the grounds that the proposed development is not in keeping with the character of Guildford, their protest is heeded. However, even though many more people have protestested at the proposals (in the previous draft of the Local Plan) for more housing in East Horsley and Wisley Airfield site (achieved by the expediency of GBC re-defining what remains within the Metropolitan Green Belt), their wishes are ignored by GBC. This is hardly an endorsement of local democracy in action.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8124</th>
<th>Respondent:</th>
<th>8920353 / Andrew Russell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

**Large Scale Housing**

Why are Surrey University promoting Housing land at Blackwell Park, do they not have enough land? what is the reason for actively promoting a site for Development of this scale? This on top of potential Housing on a massive scale at Wisley, Gosden Hill and Send/Ripley much of which will have a detrimental effect on the local infrastructure and will completely alter the character of the area. It gets back to Green Belt and protection, the area around Ripley and Send is a pleasant place to live because new Development is protected by Legislation and should not be compromised. All of the aforementioned sites will effectively create a corridor of excessive development along the A3, the result of which will be increasing pressure on infrastructure to the extent that West Surrey will be subject to fundamental change which, in my view will ultimately see the amalgamation of many districts and Villages within the area, not least the ultimate merging of Guildford and Woking particularly when ones consider the impact of further development at Merrow, potentially linking with Ripley (Garlicks Arch) and ultimately with further development in Send, Old Woking and beyond. There really must be a consensus of common sense in relation to the Draft Proposals otherwise the area will merge in the way suburban London has done over the last 30-40 years..

**Brown Field Development Insetting of Villages:**

I am extremely concerned that GBC have failed to grasp the opportunity of following clear Government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership such as Slyfield Industrial Estate and it would seem a practical and readily achievable alternative which is much more acceptable to local residents. Constraint should be applied as has been the case in neighbouring Woking Borough, Guildford is a special case with swathes of the Borough subject to AONB and AGLV status, it is a fact that this statutory protection should prevail notwithstanding the perceived need for additional homes in the Borough.

I am against the insetting of Villages albeit I have seen examples of sensible and tasteful development in certain instances and see no reason why Villages need to be insetted when the current planning policies and procedures seem to work well enough. It should not be an easy task to secure Planning for development within Villages that are located in The Green Belt and I see absolutely no reason why `any` Village currently within The Green Belt should be subject to Status change.

In summary I am of the opinion that the DRAFT proposals as set out by Guildford Borough are clumsy, ill-considered and frankly I would question the validity and legality of suggesting that ANY Green Belt should be considered for Housing save in cases of extenuating and extreme circumstances, moreover each DRAFT proposal on a site by site basis should also be subject to a thorough central Government assessment. To conclude, there are numerous urban land opportunities in the Borough with the added bonus of being able to accommodate higher density development with reduced means of car use and these should be exhausted before any Green Belt land is considered as a potential Housing site.
I should like an acknowledgement and confirmation that Guildford Borough Council have received this communication and I should like to be kept informed as to progress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/11978</th>
<th>Respondent:</th>
<th>8921377 / Paul Maycox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13002  Respondent: 8921569 / Steven Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The borough wide strategy proposes 13,860 houses being developed across the borough and in not applying any constraints to reduce the overall housing figure – the only course which would make reasonable sense – has the wrong starting point. No other Borough Council in Surrey has taken this approach.

The Plan places an unfair burden of development on the north east of the borough as a result of major residential sites proposed at Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25). It cannot be considered just and equitable to allocate 36% of proposed new housing to just three Wards within Guildford Borough (Lovelace, Send and Clandon & Horsley) – which at present represent only about 11% of the existing housing in the borough.

The identity of the villages in these rural Wards will be destroyed by the joining up of development all along the A3, from the M25 to Burpham (proposal for 5,036 houses) and beyond.

In addition, the proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a huge, permanent detrimental impact on the communities of Ripley and surrounding villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/13194  **Respondent:** 8921857 / Claire Kukielka  **Agent:**

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, **is Sound? ( )**, **is Legally Compliant? ( )**

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived...
from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent and has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The planned proposals and the disproportionate amount of development in one area of the borough has not been thought through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough's designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.
There is no further evidence provided as to why so many more houses are required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17008</th>
<th>Respondent: 8923905 / Claire Bridges</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12642</th>
<th>Respondent: 8923969 / Stephen Newt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The borough has taken the easy way out in the plan and ignored the primary purpose of the Green Belt. Transport and SSSIs have taken primary consideration. Problems with the A3 around Guildford and the Downs providing a funnelling effect through Guildford have been accepted as limitations in the basic thinking for the plan. This plan is meant to provide the framework for development over many years and should have been prepared to consider radical infrastructure changes for such a large increase in housing stock. This is a plan which will fundamentally change the nature of the borough but has been done by essentially squeezing them in within the current communication structure. The result is an inadequate plan based perceived housing need (specifically stated as an inappropriate reason) without vision or reflection on the overall character implications for the borough. However painful, it is essential that this plan is rejected before urban sprawl envelopes Guildford and we become as much a part of London as Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2646</th>
<th>Respondent: 8924065 / Rachel &amp; Colin Holloway</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1569</th>
<th>Respondent:</th>
<th>8924161 / Peter &amp; Victoria Luckham-Jones</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1438</th>
<th>Respondent:</th>
<th>8924449 / Caroline Mayne</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S2: The Plan as a whole is undermined by massive errors in the housing need figures. The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5781</th>
<th>Respondent:</th>
<th>8924577 / Charles Lee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the Borough Wide Strategy

2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1208  **Respondent:** 8925153 / D B Saidman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. **THERE IS ENOUGH BROWNFIELD SITES AVAILABLE**

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Garlick's Arch development, Gosden Hill, Wisley airfield and development at Clandon Golf course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10985  Respondent: 8926401 / Christine Medlow  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

S2 Borough Wide Strategy

P 28. The housing and retail targets are too high (see 3 above).

The town centre must include provision for the everyday retail and service needs of local residents. The area in which I live, to the SE of the centre, has no “Local Centre” and so nowhere else where this function is provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15133  Respondent: 8926529 / Annie Cross  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly. I object these figures were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body. Who are all these homes for? Not local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1860  Respondent: 8926529 / Annie Cross  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2 – Planning for the Borough

1. **I object:** to GBC producing an Assessment of Sites for Amenity Value (which includes numerous sites for potential housing), plus other sites in the borough, but not projecting even rough numbers of potential homes on these sites to reduce the need to include large Green Belt sites.

2. **I object:** to the amended plan ignoring the government’s NPPF guidelines - “……. local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. (NPPF, Section 9, para 84). This is proven in the GBC continuing to propose large Green Belt developments.

3. **I object:** to GBC making amendments whilst doing little to meet the principle of the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).

4. **I object:** to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.

5. **I object:** to GBC making amendments which do not address the 32,000 +/- comments made on the 2016 draft, particularly regarding Green Belt.

6. **I object:** that the amended draft does not encouraging utilising the numerous surface public car parks in Guildford town, surrounding areas and at Surrey University to provide sustainable homes, close to employment opportunities, facilities and transport links, with public car parking relocated underground. The university could house its students and free up properties in Guildford currently needed by students.

7. **I object:** to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

8. **I object:** to GBC amending the plan to include further development in the north-east of the borough as some sites are just not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/651  **Respondent:** 8926657 / Lian Grieves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) I OBJECT to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/3546  **Respondent:** 8927233 / Clare Maguire  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---
13. I object because of the *current condition of the roads in the village*. The local roads are breaking up with our current volume of traffic and this will be worsened by the huge volume of construction traffic which will be involved and then the subsequent increase from the new housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17317  **Respondent:** 8927297 / Amanda de Haast  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to Policy S2 - Borough Wide Strategy

The objective of adding 13860 new homes to Guildford Borough by 2033 is totally unrealistic, unnecessary and unjustified.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11902  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Firstly I want to register my disappointment that Guildford Borough Council has taken little notice of the comments made by the public in the initial consultation on the local plan. There is no point asking for comments if they are then to be ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17003  **Respondent:** 8927905 / Jacqueline M Fish  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I urge the Council to revisit the housing numbers, utilize brownfield sites for housing rather than green fields and critically to fulfil their election commitment to protect the Green Belt and to retain the Horsleys within it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/11700  **Respondent:** 8928033 / P. Richardson  **Agent:**

<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5724  Respondent: 8928161 / Jan Brophy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the threat the Local Plan poses to the historic rural villages of Ockham and the Horsleys and the blight on properties there. These are villages would change considerable with 2,000+ dwelling development at Wisley and the additional housing proposed on the Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11925  Respondent: 8928289 / Trevor Skerritt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16998  Respondent: 8928961 / Sue Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Conclusion

Guildford Borough Council are planning to increase the Borough by 25% over the next twenty years. I have to ask why? Also Guildford Borough Council proposes to put 65% of the prosed new housing in Green Belt Land in complete contravention of NPPF guidelines and expressly against Government policy for protection of our much needed and precious Green Belt land.

There comes a point when Guildford Borough Council will have to admit that only small scale development is possible.

Overall my feeling that this has not been a well thought out exercise, and one wonders how much genuine planning lies behind this document. There seems to be no vision for what we want our Borough to achieve and look like. Unjustifiable housing numbers have been proposed and with little attention given to sustainability. It was made very clear in the NPPF that the Government attaches great importance to Green Belt land and stated that once established, Green Belt boundaries should only be altered in exceptional circumstances, and yet this has been completely ignored. Guildford Borough Council itself clearly identifies in the Settlement Hierarchy that urban areas are more sustainable areas for development than rural areas. Yet it has not even listened to its own guidelines.

Is Guildford Borough Council so lily livered that it cannot argue at Government level that the numbers being asked of us are too high or is there a hidden agenda for ignoring NPPF guidelines? Why has it not been argued that the south-east of England is already full to bursting? Has anyone considered the overall effect of all this proposed development? Not only are minor roads already busy but the A3 is choked every working day. Coping with tens of thousands of extra vehicles, brought about by the massive housing target, on a daily basis is just impossible.
I am not against some development, but I believe it should be proportionate, using brownfield sites and with great attention to the sustainability of any proposed development. Our villages need small numbers of genuinely affordable homes to rent to people who work locally. The town similarly needs affordable properties to rent to people who work locally. The university must be made to build accommodation for its staff and students, as it has permission to do, and release other homes currently occupied by students, a transient population, for local families. We do not need large expensive homes – these will always be snapped up because at the moment Guildford Borough is such a desirable place to live and commute from.

I do think the “south east” issue should be challenged at high level. We cannot forever be the “sponge” that absorbs all comers. I also think that the Green Belt should be protected at all costs. Once we let one bit go we are going to be doomed to creeping urban sprawl with severe destruction of all that is precious in this land.

The current proposals in the draft Local Plan would destroy the qualities that make Guildford a good place to live and work. Developers, once given planning permission will use their usual wiles to get around their original proposals and we will end up with the worst of all worlds. Please do not let developers and the university dictate what Guildford needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2383  Respondent: 8928961 / Sue Reeve  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the housing targets set out in Policy S2.

The local plan sets out a very high level view of the Borough as Guildford Borough Council sees it over the plan period. There are a series of three very large new developments, The Hogs Back (Blackwell Farm), th Slyfield redevelopment, Burpham (Gosden Hill Farm) and Ockham (Three Farms Meadows) (between 1700 and 2000+ for each development) and a large development at Send (Garlick’s Arch and nearby area 700 houses, new A3 entry and exit access points and industrial buildings) and a large increase the Horsleys of some 400 houses. It is to be noted that all of these, developments are adjacent to the A3/A31 (The Horsleys some 3 miles from the A3) and all but Blackwell Farm are to the eastern side of the Borough which is a very disproportionate spread. Overall the Local Plan represents a level of building which will mean an increase of over 22% in housing stock in the Borough in just over 10 years. This is a huge proportional increase in the Borough and enormous burden on the infrastructure and nearly double the prediction for growth for our area made by the Office for National Statistics.

At a time when Brexit negotiations are in their infancy and there is considerable uncertainty in future economic growth and population trends, Guildford Borough Council has chosen to adopt the highest forecasts given by their consultants GL Hearn for future housing need. Surely this is a reckless strategy. It is also very much out of line with the planning expert employed by Guildford Residents Association (Mr Neil MacDonald, who has impeccable credentials) who was asked to provide an independent assessment of Guildford Borough’s housing needs and who calculated a much lower number than GL Hearn did. It is also worth saying that recently the Planning Inspector, when reviewing Waverley Council’s Local Plan, acknowledged Mr Macdonald’s expertise and was happy to accept his calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

EHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

EHPC finds this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of EHPC’s particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, EHPC doubts whether this is actually the case. It is certainly not a vision that is shared by EHPC, which unequivocally rejects GBC’s Forced Growth policy.

**EHPC accordingly OBJECTS to the borough housing targets set out in Policy S2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with any residents. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis is on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

I object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
It is extremely doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit I therefore object to the Borough Wide Strategy. National Planning Policy promotes sustainable development, which this-total plan lacks.

What is driving the need for housing in and around the villages of Guildford? I suspect it is the greed of our Borough Council to build more business premises and attract more people to live in the area, which is ludicrous as the road infrastructure is overloaded as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5477</th>
<th>Respondent: 8930465 / Michael &amp; Carol Cook</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the developments proposed at Garlick's Arch, Wisley Airfield, Gosden Hill and Clandon Golf Course I object to the lack of proper infrastructure planning for those sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15911</th>
<th>Respondent: 8930625 / Malcolm Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

the plan proposes over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without needing to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15912</th>
<th>Respondent: 8930625 / Malcolm Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2671  Respondent: 8931105 / Elizabeth Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1. there is no clear justification for the removal of one strategic site over site A35;
2. the inclusion of A35 would not contribute to the 5-year housing projection due to constraints particularly in the provision of sewerage capacity;
3. the inclusion of a 10% buffer in the housing number over the plan period is unnecessary;
4. the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 is unclear and has been challenged by other experts including NMSS;
5. the transport evidence base including the SHAR 2016 Highways assessment report has been criticised by Mouchel for using out of date modelling software and is therefore unreliable;
6. GBC has directed the transport assessment to use prescribed vehicle movements from this site with no justification;
7. GBC has not as required, used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. The housing number is unsound and open to legal challenge;
8. the disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels;
9. policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound;
10. of the quantity of space allocated for retail in the town centre which could be better used for residential development. Reliance on the Carter Jonas study update 2017 which includes demand for retail space from companies already in administration is strange to say the least;

16: the unfair imbalance of the plan across the borough as regards housing, becoming even more biased against the north east of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

Because of the above and many other reasons cited by the Horsley Countryside Preservation Society, Ripley Action Group and Wisley Action Group all of whom I support, this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12627  Respondent: 8931233 / John Pemberton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the concentration of the new housing in the Greenbelt in the NE of the Borough. 23% of the new housing is proposed in the Parishes of Send, Ripley, Ockham and the Horsleys.

I object to the developments in the Greenbelt where 70% of the new housing is planned. Urban brownfield land is being protected for unexplained reasons. This strategy is contrary to the manifesto commitments made prior to the election last year. GBC seems intent on urbanizing the length of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18097  Respondent: 8932193 / Maureen M. Chalmers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that Brownfield sites seem to have been ignored in the Proposed Submission with further destruction of the Greenbelt.

This is despite GBC Councillors who were elected at the last election on the promise of keeping the Greenbelt free from development.

Despite all the hard work and cost involved in producing the Proposed Submission, I feel that major alterations will have to be made prior to it being presented for inspection particularly with the uncertainty that Brexit now brings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10765  Respondent: 8932769 / Janette M. Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our roads cannot cope with the present traffic. The council appear to be unwilling to face the problems eg Rice's Corner which desperately needs a roundabout. Heavy lorries thunder through Chilworth as do many lorries with drivers under instruction. Not only is the traffic situation poor for drivers it is appalling for pedestrians, especially parents taking their children to school when traffic is at its worst. Doctors' surgeries and schools, two vital constituent parts of life, are overcrowded, resulting in the obvious concerns. We cannot take more houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to 13,860 additional homes by 2033. This number is too high. It is unrealistic. It will harm the environment (loss of green fields and trees and more pollution). See page 5 of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4.1.7 Policy S2 Planning for the Borough -Our Spatial Development Strategy

Suggested change: a small number of rural

Objection to the implication that Green Belt land will be used for building development. See pages 5-6.

Countryside beyond the Green Belt: (small scale, low density) urban extensions to Guildford and Ash and Tongham: (without taking Green Belt land) Page 26 Policy S2

Suggested additional text: We will meet our statutory obligations but future provision for gypsies, travellers and travelling show people, will be limited in view of the large number of existing sites (compared with the number of sites provided by other councils) and in view of the large number of sites in the west of the Borough.

Policy S2 Borough Wide Strategy

Objection -The reasons for objection are below (on pages 5-7 of this letter).

Targets

The target of 13,860 new homes during the Plan period (2013-33) is too high and unrealistic. It will harm the environment (loss of green fields and trees; more pollution). My view is there should be up to 400 new homes built per year.

Serious questions have been raised about forecasts of the number of homes that should be built (the use of historical statistics etc). Forecasts, especially involving economics over extended periods of time, are often wrong or misleading

Green Belt

(a) The Green Belt was established to meet a number of important needs, and those needs have not gone away.

(b) There should be no building on the Green Belt, except perhaps small scale, limited infilling.

• The number of houses and other buildings proposed in the Local Plan should be greatly reduced, otherwise significant harm will be done to the Green
It is unwise -and unsustainable - to have huge numbers of extra buildings in the Borough of Guildford (especially in the Green Belt) to cater for a national population which is increasing at a fast pace. There is now widespread use of the term "housing needs" even though in some ways it lacks precision. The word "need" means lacking something which you cannot well do without ; necessity; requiring relief eg extreme poverty or distress. However, for many people it would be a matter of preference - not need - to live in Guildford Borough rather than somewhere else.

Seeking to Maximise Housing Delivery

Seeking to maximise housing delivery is implied in Policy S2. History since the 19th century has shown us that, it is not sensible to build a maximum number of homes to meet demand, in most areas of the UK. The worst results have been slums, brutal high rise flats contributing to crime and social problems (some of which had to be demolished after a short life) and spoilt townscapes/landscapes. High demand in the South East is now almost endless. But land in the UK is not unlimited, especially in the South East.

Building homes outside the south east would be more sensible than building on the Green Belt around London.

Farmland (Existing or Potential) Taken for Homes

Agriculture is, like accommodation, very important. We need more farmland, not less, so that we can produce more food in a sustainable way. About 50% of our food is rented. But soil in many parts of the world is degrading; water in many parts of the world is inadequate; and more countries need to import food or to keep food for their own growing populations rather than export it to us. A forecast for global population in 2050 is nine billion and this will affect the UK. Low quality farmland can be used for planting trees to help deal with pollution and climate change. It should not be used for building in the Green Belt.

Pollution

Meeting needs or demand for homes in the Borough will mean more roads to service homes, more vehicles and more air pollution. Poor air quality is already causing illness and death, especially in the south east. Data from Public Heath England indicate that 5.3% of all deaths every year in people over 25 are linked to air pollution. It is especially bad for children because their lungs are still developing.

The Guildford Borough Local Plan should contain data showing existing and future air pollution levels in various places in the Borough (eg in Ash and Guildford), just as it contains facts and figures for many other subjects. Data should not be in supporting documents only.

C) Farmland, Fields and Woods Between Towns and Villages

These help community cohesion, quality of life and life expectancy. They should be retained, not reduced in area.

For example, the green gaps between the furthest edges of existing development, from Ash to Guildford, extend to a total of only about 2-3 miles. So, there should be no more development allowed between Ash and Guildford (including ribbon development) with only a very small number of special exceptions to such a policy.

Homes in the UK - General

There will have to be an under supply of housing in Guildford Borough because of the need to protect the countryside and the character of towns and villages. But there could be an oversupply outside the south east (eg in the north west) which could be used to accommodate people, if they decide to move there. Certainly, there are 'brown field sites' in London and outside the south east.

Realigned Green Belt Boundaries

Central government has said that there is no need for Green Belt land to be removed unless there are exceptional circumstances. It seems that central government's policy is that, in general, homes etc should not be built on the Green Belt.
Belt. See the letter from the Parliamentary Under Secretary of State (Planning) dated 18 June 2014, enclosed with my letter of the 10 September 2014.

live of: reflecting

1. 11.11 Policy S2 Borough Wide Strategy

Table 1 - Planned Delivery Between 2018 and 2033 Table 2 - Hierarchy of Retail & Service Centres

Objection to building development, as below.

Ash & Tongham - too many houses and too much density. There should be no building in the Green Belt.

Ash and Tongham strategic location of growth - too many houses and too much density.

Normandy and Flexford village expansion (Policy A46) - there should be no building on the Green Belt The proposals reduce the distinction between the rural area to the north of the Hog's back, and the urban areas of Aldershot/Tongham/Ash to the west and Guildford to the east. See 3.2 of the Local Plan. There will be too many buildings and too much density. See pages 5-7 of this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17130  Respondent: 8933185 / Peter See  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 29 Policy S2 Planning for the Borough – Our Spatial Development Strategy

Objection to the implication that much Green Belt land (some of which may not be specifically identified in the Local Plan) will be used for building development, even though it may not be a brownfield site.

Page 29, 4.1.9, Policy S2

Add to your list, Ash and Tongham, as Policy A29 on page 212 states “Land to the south and east of Ash and Tongham - This is a strategic location for development”.

Objection to Ash and Tongham being a strategic development site. There is an implication that there will be inappropriate, large scale growth, perhaps with ugly tall buildings and inappropriate large scale road building. There will be insufficient land available to justify the term ‘strategic development site’.

Pages 30-31 Policy S2

Objection – The reasons for objection are below. More justification for this objection is in my letter dated 5 July 16, pages 5-7.
The target of at least 12,426 new homes (700-850 per year) during the Plan period (2015-2034) is too high and unrealistic. It will harm the environment (loss of green fields and trees; more pollution). My view is there should be up to 400 new homes built per year.

Serious questions have been raised about forecasts of the number of homes that should be built (the use of historical statistics etc). Forecasts, especially involving economics over extended periods of time, are often wrong or misleading. It is unwise, and unsustainable, to have huge numbers of extra buildings in the Borough of Guildford (especially in the Green Belt).

Page 31, 4.1.9b

and includes a 20 per cent buffer: and a 20 per cent buffer

Page 31, 4.1.0

and do not: and does not

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Page 29, 4.1.9, Policy S2

Add to your list, Ash and Tongham, as Policy A29 on page 212 states “Land to the south and east of Ash and Tongham - This is a strategic location for development”.

Page 31, 4.1.9b

and includes a 20 per cent buffer: and a 20 per cent buffer

Page 31, 4.1.0

and do not: and does not

Attached documents:

**Objection to the Guildford 2016 Local Plan**

I OBJECT to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues listed below. I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon, West Clandon, Send Marsh, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are as follows:

1. I OBJECT to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years). I object on 3 grounds:

   1. these housing numbers have been imposed with no real consultation being undertaken with residents;
2. The housing numbers are based on a high-growth economic development plan which in itself has had no consultation and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London;

3. No real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years.

2. I object to the proposed scale of new building throughout the borough, which is disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2963  Respondent: 8933889 / Nicholas Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) I object to the disproportionate allocation of housing in the north of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13277  Respondent: 8933953 / Stephanie Billington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is not too late to make a Local Plan which accords with the character of the Borough and the wishes of local people. I call on you to carry out a proper Plan/GBC led review of urban brownfield sites, particularly in and around Guildford town centre, as proposed some time ago by Guildford Green Belt Group. Their work shows that a much greater proportion of housing need can be met in the urban areas on brownfield sites and I support this, as someone who wishes within about 10 years to move to an urban area for proximity of amenities and to remove the need for car travel. Redeveloping urban brownfield sites is not of course the easiest way for developers to make a profit, but it is best for the whole of our borough as recognised in your Vision, but not carried through into your policies. It is time to stop allowing developers to lead the Plan by proposing sites and time to make it clear that there is no big profit to be made by banking Green Belt land for future development. Please stand by the promises that have been made to protect that land.

I call on you further to make a realistic and transparent estimate of real local housing need in accordance with Parish Council neighbourhood surveys and in line with national statistics, revised to take into account economic and other forecasts post the Brexit vote. Stop wasting our money on opaque modelling that is not explained even to you who are supposed to be representing us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/15923  Respondent: 8934561 / Chris Jubb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This plan barely deserves the title of a plan. It seems to me to be a catalogue of things that might happen without any clear vision of what sort of town we are aiming for. Adopting the SHMA result as a housing target without applying constraints means that the Borough Council is abandoning any consideration of any of the Borough’s needs other than having a huge house-building programme. Committing to so much Green Belt development is a contradiction of the Conservative pledge to protect the green belt. The transport provisions are sketchy and will not alleviate the congestion already present and destined to get worse when the new developments are built. Why is there a 40% increase in retail space specified when on-line shopping will make such an increase unnecessary? The plan is not ready for an inspector.

I support an expanding and thriving Guildford which evolves in a way which maintains and enhances the character of the town and preserves its country setting. This plan does not address such development and is merely an assembly of developers’ wish lists. I commend the submission from the Guildford Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1383  Respondent: 8934657 / Nigel Watson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This revision now proposes a target for new housing in Guildford borough of 12,426 homes. While this is a small reduction from the 13,860 proposed in the previous draft, it still seems far too high. I strongly object to the 12,426 homes target for the following reasons:

a) The conclusions of the revised SHMA are very likely wrong

However it takes insufficient account of many significant changes during the past 12 months, particularly those connected with Brexit and national targets for reduced immigration, which are likely to result in major changes in population trends, migration patterns and the economic development of the UK. It is very probable that the whole economic future of the UK is less rosy than many people (especially politicians) like to think. In addition to Brexit, two other major factors that will limit growth are climate change and constraints on energy supply. Both seem likely to impact on economic activity, prosperity, and housing demand during the coming decades. It is also worth noting that expert demographers confidently expect world population to peak within the next few decades, and then start to fall.
While this will take time to work through to become a reduction in UK housing demand, it does suggest that assuming and planning for an never-ending increase in UK population is the wrong strategy. In this context, it is surely prudent to prioritise the conservation of our irreplaceable natural assets of wildlife and countryside; and not promote a suburban sprawl which in the longer term would be wasteful and unnecessary. Instead we need to re-direct necessary development towards under-used and brownfield sites.

On the detail of the Plan’s housing numbers, I agree with much of the analysis submitted in comments by East Horsley Parish Council and will not go into this further. The key point is that given the considerable uncertainty in all forward trends for economic growth, population and housing demand, it would be prudent to be very cautious and conservative in making forward projections used for long term policy. So, why has GBC chosen to adopt the highest forecasts on offer to establish projections of future housing need in the borough? I believe this approach by GBC is almost certain to be wrong.

b) GBC fails to allow adequately for known planning constraints, especially the Green Belt. GBC seems to be taking the housing need projections of GL Hearn as the housing targets proposed in the Local Plan. This however fails to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt; and our already over-stretched infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally I'd like to comment on the effect of this programme of accelerated and forced development of our village (East Horsley) on the local infrastructure. To take just one example, the roads are simply not wide enough to accommodate an increase in lorry and commercial traffic, and the geography of the two villages prevents a widening of most of the roads which are little more than country Lanes. A few days ago there was a serious car collision in the very centre of East Horsley because of poor visibility. It is simply not good enough to say that our infrastructure services are the responsibility of a different public authority; council tax-payers have the right to expect joined-up thinking. If the building programme goes ahead as you propose, it will involve a permanent down-grading of the quality of life in this part of Surrey.

I therefore object to the draft Local Plan because of the perfunctory attention that is given to the effect of the proposed house-building on the local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy S2 BOROUGH WIDE STRATEGY

The Plan proposes the provision for 13,860 new houses for the period to 2033. Why? There is certainly a shortage of particular types of housing within the borough. However there is MUCH DOUBT as to the need for such a large number of new houses. I can find NO EVIDENCE to support GBC's claim that the need is there! I can only find evidence to show that GBC have wildly exaggerated the requirement for new housing. The rampant expansionist policy being promoted by GBC is very alarming. I strongly deny the need to build 693 houses per year through to 2033. This presupposes the requirement for a 250/o increase in the housing stock over the borough in that time. However this does not even agree with figures from The Office of National Statistics suggesting an increase of 15/o in the population of Guildford over that time. There is also now evidence since the EU Referendum that the economy will be cooling down and there will be less migration and less housing need than expected. However I suppose it is quite possible that with the falling pound more foreign investors will be interested in buying into our housing stock!

I am particularly annoyed that GBC have a propensity to blame others for their plans & actions! When a query arises over the matter of the excessive numbers, GBC blame official government policy & legislation for the figures. I understand the relevant government departments do not agree with this assessment!

The effect of S2 on The Horsleys

Under this New Local Plan East & West Horsley Horsley together could receive 593 new houses. At this moment there are fewer than 3,000 houses in the two Horsleys. Although the two villages each have their own very clear identity, development in one has a substantial effect on the other. Many facilities are shared. The schools are in West Horsley, while the station, shops and surgery are in East Horsley. All these facilities are considerably over stretched at present so
to add 593 houses to the stock would result in chaos and would certainly not meet the sustainable development criteria as set out in the NPPF - there would be NO economic, social or environmental enhancement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5550  **Respondent:** 8938881 / Ann Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Policy S2 BOROUGH WIDE STRATEGY**

The Plan proposes the provision for 13,860 new houses for the period to 2033. Why? There is certainly a shortage of particular types of housing within the borough. However there is MUCH DOUBT as to the need for such a large number of new houses. I can find NO EVIDENCE to support GBC's claim that the need is there! I can only find evidence to show that GBC have wildly exaggerated the requirement for new housing. The rampant expansionist policy being promoted by GBC is very alarming. I strongly deny the need to build 693 houses per year through to 2033. This presupposes the requirement for a 250% increase in the housing stock over the borough in that time. However this does not even agree with figures from The Office of National Statistics suggesting an increase of 15% in the population of Guildford over that time. There is also now evidence since the EU Referendum that the economy will be cooling down and there will be less migration and less housing need than expected. However I suppose it is quite possible that with the falling pound more foreign investors will be interested in buying into our housing stock!

I am particularly annoyed that GBC have a propensity to blame others for their plans & actions! When a query arises over the matter of the excessive numbers, GBC blame official government policy & legislation for the figures. I understand the relevant government departments do not agree with this assessment!

**The effect of S2 on The Horsleys**

Under this New Local Plan East & West Horsley Horsley together could receive 593 new houses. At this moment there are fewer than 3,000 houses in the two Horsleys. Although the two villages each have their own very clear identity, development in one has a substantial effect on the other. Many facilities are shared. The schools are in West Horsley, while the station, shops and surgery are in East Horsley. All these facilities are considerably over stretched at present so to add 593 houses to the stock would result in chaos and would certainly not meet the sustainable development criteria as set out in the NPPF - there would be NO economic, social or environmental enhancement.

**West Horsley** would bear the brunt of the development with 405 new houses. This is in a village where there is only one small shop and that is scheduled to close in a few months. West Horsley Parish Council and Surrey Community Action Survey identified a limited need for some 20 affordable homes for local people who wish to remain in the village i.e. for young people and for the elderly who wish to downsize to a smaller home. I would dispute the demand for 405 new houses in a village with no shops, no post office, no station, very limited bus service, no surgery and overcrowded schools! All the new householders would need to get in a car!

**East Horsley** has most of the facilities but it is interesting to refer to GBC's own documentation. In the Guildford Borough Council's *Greenbelt & Countryside Study Volume 5* it says "East Horsley would not be appropriate for a major village expansion due to the current population of..."
3,785 meaning that only a relatively small population growth requirement of 215 would be needed to reach the 'critical mass' population of 4,000. Well the addition of the 188 new houses proposed in East Horsley would take the population well over that critical mass! East Horsley certainly has a reasonable collection of small shops at Station Parade, named as a 'district rural' centre in the Plan. However for this 'district rural' centre parking is a big challenge. The parking facilities do not meet current demand so it is impossible to imagine the situation if the Plan goes ahead. The Plan also picks out Bishopsmead Parade as a 'rural local' centre - rather a grand title for one small newsagent/post office! The other businesses in that parade are services such as dentist or estate agents. East Horsley has a station with a reasonable service to Waterloo. However again the parking facilities are very tricky indeed. Sometimes one pays £6.50 to park and cannot find a space! East Horsley has a surgery, which is not currently meeting the demands of its patients.

One also needs to put the situation in context and look beyond our village boundaries. Under this Plan there will be 4,993 new houses built within 5-mile radius of the Horsleys; this will equate to the development of a village nearly twice the size of both Horsleys in the area Horsley/Burpham.

- Therefore I STRONGLY object to the proposals in S2 - the housing targets are not justifiable and cannot be achieved without chaos! They satisfy a demand that is not there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17108</th>
<th>Respondent:</th>
<th>8940225 / Glen Ruddy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
</tbody>
</table>

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3.3 Green Belt Development

Listing developments as Urban extension is disingenuous as this is Green Belt land. The Conservative Councillors were elected having issued a campaign promise to protect the Green Belt. Whilst the vision states that brownfield development is the preferred route the majority of dwellings are provided on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16031</th>
<th>Respondent: 8941761 / FLGCA (Paul Kassell)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object most strongly to the growth rate of 693 dwellings per annum. This figure is so fundamental to the plan, that its validity must be beyond question or the plan cannot possibly be accepted. If the number was set at the previously agreed growth rate of 322 units per annum, would the devastation of vast areas of the Green Belt be required?

The number has not been scrutinised by Councillors, nor have the inner workings and assumptions been revealed. It is absolutely essential in an era of open government that these figures are beyond reproach, instead the number is produced “out of a hat” with no justification or appropriate scrutiny.

We also object to the fact that the total exceeds even the 693 units a year, once windfall and existing permissions are taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1671</th>
<th>Respondent: 8943713 / Janice and Tim Bennett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Scale of development

I OBJECT to an increase of up to 385 potential new dwellings which is included in the proposed submission Local Plan for West Horsley in the next 5 five year. This represents an increase of over 35% which is totally disproportionate to the size of the village and at a density that is significantly above the village at present. The existing infrastructure is already at capacity and would be totally swamped by the number of new dwellings proposed and the character of the village would be changed forever.

The local primary school has been at capacity for many years and has no room for expansion. The local medical centre is also at capacity. There is no mention in the submission of essential facilities such as shops. The railway station car park is full every day and parking in East Horsley village centre is very difficult.
We ask you to reconsider the proposals concerning Horsley and change the plan to incorporate a consensus of the views expressed by all Horsley residents. Following a local survey of residents, it was considered that a limited need for some 20 affordable homes was required in West Horsley to accommodate local people, especially the young and the elderly, and we ask that you respect these views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17049  Respondent: 8944257 / Bruce Tindale  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17584  Respondent: 8944737 / Martin Grant Homes (Martin Grant Homes)  Agent: Barton Willmore (Michael Knott)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4.0 SECTION 4.1: STRATEGIC POLICIES

Policy S2: Borough Wide Strategy

4.1 We broadly support the overall level of housing provision proposed in the Local Plan which is consistent with national planning policy and the Government’s objective of rapidly increasing the supply of new housing by 2020.

4.2 In progressing the Local Plan to an Examination, GBC will need to consider the recently published DCLG 2014-based household projections which show an increased need for housing in Guildford when compared to the previous 2012-based projections which were used in the SHMA. These latest projections, together with any other more up-to-date data i.e. economic forecasts, could point to an increase in the objectively assessed need for housing.

4.3 MGH objects to the proposed phasing of housing delivery set out in Policy S2. The National Planning Policy Framework (NPPF) is clear that local planning authorities should “boost significantly the supply of housing” (paragraph 47). There is plainly an urgent need to significantly increase the level of housing provision within the Borough from the
unsustainably low levels experienced in recent years (principally as a result of policy constraints restricting land supply). The inclusion of a phased approach to housing delivery is unduly negative and unnecessary.

4.4 As set out below, MGH is committed to bringing forward the delivery of housing at Gosden Hill at an early stage in the plan period. This will likely include a contribution to supply in the first five years of the plan period.

4.5 Furthermore, the annual housing numbers set out in the phasing schedule do not take account of the under delivery in housing provision since the start of the plan period (2013). We therefore seek an amendment to Policy S2 which removes phasing and provides for an annual average figure covering the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17217</th>
<th>Respondent: 8944929 / A Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the overdevelopment of sites particularly those outside the urban area. Perversely the density proposed for housing within the urban is less than for example allocation A35 where the proposed density is higher than in most London Boroughs – this proposal is urban in nature and completely out of keeping with its surroundings.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17224</th>
<th>Respondent: 8944929 / A Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that many of the allocated sites are being planned in unsustainable locations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2723</th>
<th>Respondent: 8944929 / A Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

5. I object to the plan period being inconsistent. This is an example (of which there are many) of extremely careless work which gives me no confidence in the content. For example, the foreword mentions an end date of 2034 whereas the introduction 1.2 and 1.3 refer to 2033. Spatial vision uses 2033. What is the plan period? This is very unclear.

5. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

7. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

17. I object to Para 4.1.11 which should clearly identify the version of the LAA and not just refer to “the latest”.

35. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 Draft Local Plan with particular regard to the amount of proposed development around the Burpham and Merrow area. This plan merges all the villages along the A3 from the Hog’s Back to the M25. Yet there is no provision for specific infrastructure improvements to either the A3 or local roads. Just some of the reasons are listed below:

- Once the Green Belt has gone it will be lost forever.
- There is a lack of evidence for the doubling of housing need numbers – 693 a year is more than double the previous figure of 322.
- There is a proposed disproportionate level of development in one area of the borough ie Burpham.
- There is a disturbing lack of specific details about essential infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/8751  **Respondent:** 8946593 / John & Sheena Preston  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Transport and Infrastructure. When I was born in the 50's the roads were adequate and there was little congestion. As the country prospered car ownership increased but really the only reactions to the were the introduction of the 'gyratory system' and improvements to the A3. Guildford is also a market town that attracts people and a 40% increase in retail space will increase that attraction and thus require a plan to cope with both the increased traffic and the attendant parking requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1516  **Respondent:** 8946721 / Fiona Middleton  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I object to the disproportionate development in the borough, the extent of the housing proposed in green field areas is unprecedented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/1302  **Respondent:** 8947457 / Gerry Armstrong  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
I object to Policy S2 and the modified target of 12426 homes. The new target calculated has not been explained or justified. 12426 is unsustainable development and will impact greatly on utilities, infrastructure, and the environment.

I object strongly to taking unfulfilled housing needs from Woking and Waverly there’s not enough space or infrastructure to take more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. The planned provision of 13,860 new homes across the borough was based on a flawed SHMA that has not been scrutinised or evaluated and has not been reviewed following the result of the Referendum on Britain’s membership of the EU. I believe the population projections used were already too high even if Britain remained in the EU, but if it leaves they are undoubtedly far too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16146  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• The focus should be on bringing currently empty properties back into active housing use and using all available brownfield sites to provide the homes actually needed rather than allowing Green Belt land to be destroyed in pursuit of profits for developers of market housing.
• Guildford Borough Council has no mandate to pursue such an aggressive growth strategy, which is driving the insetting of villages, growth of retail centres outside the town and proposed housing development far in excess of, and of a mix not appropriate to, that actually needed by the Borough’s residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16150  Respondent: 8948385 / Gillian Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. The planned provision of 13,860 new homes across the borough was based on a flawed SHMA that has not been scrutinised or evaluated and has not been reviewed following the result of the Referendum on Britain’s membership of the EU. I believe the population projections used were already too high even if Britain remained in the EU, but if it leaves they are undoubtedly far too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6164  Respondent: 8953441 / William B. Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to express my total support for “Guildford Residents Association” in their opposition to the planned housing development in the Guildford area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/852  Respondent: 8953601 / C. Way  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are writing to express our dismay at the plan to expand our town further. To sacrifice even more of our precious green belt seems madness. The proposal for more than 12,426 homes is excessive, given that the population growth could be an over estimate.

We need a plan but not one based on questionable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8052  Respondent: 8954529 / Maggi Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is irresponsible to use all available green field sites, in a single plan leaving none for the future

Brown field opportunities should be maximised to provide the homes that are needed otherwise this is a wasted opportunity

Guildford should be trying to constrain its overall housing growth as other places are doing and it is not acceptable if it chooses not to do so

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8506  Respondent: 8954753 / I. & E. Tyers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In relation to the Local Plan proposals we are writing to say that we object to the over inflated development proposals and we support the Guildford residents Association (GRA) response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10262  Respondent: 8954977 / Patrick Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed distribution of housing in the 2016 Local Plan. This Local Plan identifies sites for some 1,800 new homes to be built in the Central Wards of Guildford and some 11,000 in the outer wards of Guildford Borough with some 9,600 of the new homes in the outer wards being congregated in very large sites of 400 homes or more. Without doing detailed sums I suspect this proposed provision is almost in a directly inverse proportion to the existing housing stock. This is monumentally unfair to residents who have typically invested between a quarter and a third of their income in the home and environment of their choice. The Plan needs to be revisited and use innovative methods to establish a fairer distribution of new housing in proportion to existing housing, which for example, sees Send Marsh / Burnt Common expected to accept an increase in 48% in home numbers and Send Parish as a whole see an increase of 20% plus with other areas being allocated increases of 2.5% or less.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15515  Respondent: 8954977 / Patrick Sheard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Distribution of Housing

The Society objects to the proposed distribution of housing in the 2016 Local Plan. This Local Plan identifies sites for some 1,800 new homes to be built in the Central Wards of Guildford and some 11,000 in the outer wards of Guildford Borough with some 9,600 of the new homes in the outer wards being congregated in very large sites of 400 homes or more. Without doing detailed sums the Society suspects this proposed provision is almost in a directly inverse proportion to the existing housing stock. This is monumentally unfair to residents who have typically invested between a quarter and a third of their income in the home and environment of their choice. The Plan needs to be revisited and use innovative methods to establish a fairer distribution of new housing in proportion to existing housing.

1. Overprovision of Housing

The Society objects to the overprovision of housing provided for in the Local Plan 2016. The plan provides for approximately 31% oversupply of the OAN number while making no allowance for infill housing that is not envisaged by the Local Plan, rather seeing this infill is seen as ‘windfall supply’ or should that be oversupply. If the Target numbers are to be recalculated as discussed in Section 1 above this oversupply may be around 40% or more. Whilst the Society can understand a desire to allow for some sort of oversupply in the short term it seems madness to allow for
oversupply some 17 years into the future. No one can see that far ahead, three different governments will have come and
gone by then and policies will have changed. The fact is that any substantial sites which identified in the plan will
inevitably lead to housing blight in their immediate vicinity until they are identified as not required. The Council must
make decisions and eliminate some sites before the Plan is finalised.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/6457 | Respondent: | 8957409 / Horsley Countryside Preservation Society (Roy Proctor) |
| Agent: | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |

Thank you for the opportunity to comment on the Guildford Borough Proposed Submission Local Plan (GBPSLP).

The Society wishes to register its concerns over GBPSLP and the Evidence Base which supports it. We realise that the
' Evidence Base is not a part of the consultation process, but because it underlies the whole of the GBPSLP, and we
continue to see the inaccuracies and inconsistencies which we outlined in our previous letters in response to the Options
document (2013) and the Draft Local Plan ((2014), we therefore **Object to the Proposed Submission Local Plan**.

We outline below some of the specific items to which we object.

**Policy S2 - Borough wide Strategy.**

We consider that the Housing Targets on which the policy is based are derived from an Objectively Assessed Housing
Need (OAN) and a Strategic Housing Market Assessment (SHMA) which are flawed. The modelling to produce the
original number has not been demonstrated to adequately represent either the historic immigration figures nor the
projected figures issued by the Office of National Statistics (ONS). The further increases made to the demographic
starting point are in some cases inappropriate and in some case erroneous. Given that the proposed developmental needs
in the borough are based on what we consider to be inaccurate data we **object to Policy S2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP171188 | Respondent: | 8957409 / Horsley Countryside Preservation Society (Roy Proctor) |
| Agent: | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
Policy S2

HCPS strongly object to the number of houses identified for provision during the plan period.

Our objection is mainly based on two considerations:

1. The total number is based on a flawed Strategic Housing Market Assessment (SHMA) for Guildford. The major contributors to the inaccuracy in the numbers are: perceived errors in the net migration figures for the borough; the inclusion of student housing needs which are already accounted for elsewhere in the calculations; inconsistent use of data from disparate sources to calculate the homes needed to support job growth. The detailed argument for this is to be found in Neil McDonald's report of June 2017 entitled "Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA".

2. The total housing number resulting from the flawed calculations is then used without any constraints. It is our contention that the target number used should have constraints applied in correcting Objectively Assessed Needs (OAN) to take account of Green Belt, infrastructure and other relevant issues.

Since the target numbers for housing requirements underlie most of the other policies in the proposed Plan, doubts concerning their accuracy mean that much of the current document remains suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2540</th>
<th>Respondent:</th>
<th>8958369 / B.P. Austin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document:</td>
<td>complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policies

Housing targets

1. I object to policy S2. The figures given for growth needed in the number of houses amounts to 25% increase over the plan period whereas the National Statistical Office’s estimate of population growth in the same period is 15%. Why is there this discrepancy? According to census data much of the growth in the period up to 2012 was not from natural increase in the local population but from incomers. In the post-Brexit situation this growth is unlikely to continue and could turn negative. No justification is given for the high rate of growth proposed or why it creates an exceptional situation. It appears to be an artificial target self-imposed by GBC Spatial Strategy.

Spatial Strategy.

1. I also object to policy S2 on spatial strategy grounds. Though the general principles are unexceptionable the implementation, in putting a major proportion of new housing in the Green belt in the east of the Borough is detrimental to the wider national interest in the Metropolitan Green Belt, containing the spread of London. With over 64% of new homes proposed for the Green Belt its integrity and effectiveness will be seriously damaged. The insetting of Ripley, Send, Send Marsh and the Horsleys from the Green Belt coupled with the changes to their areas of settlement and the creation of the new settlement on the former Wisley airfield will thin out the Green Belt where it is most needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The University broadly supports the proposed provision under this policy of 13,860 new homes, 36,200 – 47,200 sq. m. of office and research development (B1a and b) floorspace and 47.7 – 5.3 ha of industrial (B1c, B2 and B8) employment land, to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs. This is an amount of development that will see a step change in provision of new homes in the borough against a background of under-provision.

It is noted that the level of housing that the borough is planning for equates to 693 dwellings per annum when spread over the 20-year plan period, which accords with the objectively assessed need identified for Guildford in the West Surrey Strategic Housing Market Assessment (SHMA) published in October 2015.

The University considers that the 13,860 homes figure should be regarded as a minimum (i.e. at least 13,860). This would not preclude additional sustainable development from coming forward during the plan period where it could be demonstrated that this made a positive contribution towards meeting the borough’s needs and if allocated sites were not likely to be delivered during the plan period. It would also allow the opportunity to address matters such as potentially increasing pressure to respond to changing housing needs arising from London.

The University also notes that the 99 ha of safeguarded land identified in the July 2014 draft local plan, which was safeguarded “to provide a level of flexibility and to ensure that the realigned Green Belt boundaries endure beyond the plan period” is not part of the current version of the plan. Whilst the University did not agree with the locations of the safeguarded land in the 2014 draft plan, it supports the principle of safeguarded land, as this provides flexibility for the long term and would mean that the next review of the local plan may not need to consider further alterations to green belt boundaries.

It is not clear why the idea of having such safeguarded land is no longer included in the plan. The University considers that it is important that the plan should include this as it will be important to show that the plan, in altering green belt boundaries, has looked to the longer term beyond the plan period. Given the tightness of the green belt boundary in the borough it is therefore not clear how the Council now intends to accommodate any additional housing pressure over and above what it is currently planning for, if the need arises.

Without safeguarded land there is no safety buffer should housing needs develop further, which is not a sustainable way of planning for the future of the borough.

Without the provision of safeguarded land, it is possible that there will be pressure to undertake further alterations to the green belt boundary later on in the plan period, or in a future period beyond that, whereas the matter can be suitably dealt with now in anticipation of any potential further housing needs.

The University therefore considers that the borough-wide strategy set out in Policy S2 should include safeguarded land, altering the green belt boundary in this plan to allow space for future development needs.

Such land should be well located in relation to the urban area. Land at Blackwell Farm allocated for an urban extension under Policy A26 is particularly well located in relation to the employment areas to the west of the town, and will see further employment creation as a significant part of the borough’s planned employment land is located there. It will have a new access on the A31 that will help to ease pressure on the A3. It is located on the western end of the Sustainable Movement Corridor that links it to Guildford Town Centre.

There is land immediately adjacent to the west of the land allocated in Policy A26 at Blackwell Farm that is available and is suitable for inclusion as safeguarded land. This land is well placed in relation to the new A31 access and employment
land, and the new sustainable transport links could easily be extended into this area. The area is shown on the plan at Annex 1 to these comments.

The University considers that the land should be identified as safeguarded land and the green belt boundary should be altered accordingly.

The following should be added to Policy S2:

“Areas identified as safeguarded land will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. All proposals must not prejudice the possibility of long term development on safeguarded land sites. The status of safeguarded land sites will only change through a review of the local plan.”

There should also be a new section of explanatory text as follows:

“The identification of safeguarded land ensures that green belt boundaries will last beyond the end of the local plan period. This is in accordance with national planning policy which states the intention for green belt boundaries to have permanence in the long term.

The green belt boundary will be altered to exclude the safeguarded land. Consideration of the permanent development of safeguarded land, such as for housing or employment, will only occur through a change to the allocation through a review of the local plan. During a local plan review, the reassessment of safeguarded land will involve determining for each site whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as safeguarded land until the next review of the plan.”

The plan should go on to identify the safeguarded land as a new site allocation policy (or policies) accordingly.

Paragraph 4.1.8

The University supports the recognition in this paragraph that not all development can be located within the identified sustainable locations.

The University therefore broadly supports the proposal to release allocated land in other areas, and notes the list provided, which includes urban extensions.

However, the University considers that urban extensions to Guildford, as the principal town in the borough, provide some of the most sustainable locations. The University has suggested a change to paragraph 4.1.6 to reflect this, and suggests an additional change to paragraph 4.1.8 as outlined below.

Hence the University suggests that the bullet points in paragraph 4.1.8 be redrafted as follows (and in the context of the University’s proposed change to paragraph 4.1.6 to include urban extensions as some of the most sustainable locations):

- Countryside beyond the green belt
- New settlement at the former Wisley airfield
- Development around villages (including some expansion).

Table 1 – Planning Delivery between 2018 and 2023

The University welcomes the inclusion of land at Blackwell Farm in the list of urban extensions to Guildford.

The University notes that the Blackwell Farm site is allocated in Policy A26, and has provided further responses to that specific policy, and to other site specific policies as necessary.

Table 2 – Hierarchy of retail and service centres

The University notes and is supportive of the inclusion in table 2 of Blackwell Farm as a future location for a new urban local centre as part of the mixed-use strategic development.
A new local centre is an important part of the proposals for Blackwell Farm and indeed Policy A26 highlights the elements that it would be expected to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- [160718 156110 GBC Local Plan reps final version_reduced.pdf](160718 156110 GBC Local Plan reps final version_reduced.pdf) (3.2 MB)
- [Annex 1 Current site A26 boundary and proposed safeguarded land.png](Annex 1 Current site A26 boundary and proposed safeguarded land.png) (783 KB)

Comment ID: pslp171/837  Respondent: 8967233 / University of Surrey (Sir or Madam)  Agent: Terence O'Rourke (Steve Molnar)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( Yes )

Policy S2; Planning for the Borough: our spatial development strategy

The University of Surrey notes that there have been changes to the plan period (from 2013-33 to 2015-34) and to the amounts of development proposed, including a reduction in the number of new homes. It considers that this has potential implications for the plan’s ability to provide the significant boost to housing supply encouraged by the NPPF. The plan is therefore likely to be unsound. Further details on the University’s position are provided below.

New homes

The number of new homes to be provided has been reduced from 13,860 to 12,426, albeit over a 19 year period rather than the previous 20 year period.

It is also noted that the amount of homes to be provided is now expressed as a minimum (‘at least 12,426’), and the University supports this wording change as it recognises that the plan should provide for at least this number and could provide for more. This addresses a comment made by the University at the previous consultation.

The University notes that, as previously, the plan seeks to meet the Objectively Assessed Need (OAN) for new homes, an approach that the University has supported.

However, there has been a change in the OAN to 654 homes per year, a decrease from the previous version of the plan (693 homes per year).

The University considers that the impact of meeting unmet needs from within the West Surrey HMA does not appear to have been fully addressed in these changes to the plan. It is apparent that there is unmet need of 3150 homes arising from Woking and that Guildford should be playing its part in helping to meet this. This matter was raised by the Inspector at the Waverley local plan examination hearings on 27 June 2017.

The Inspector at the Waverley hearings also considered that there needed to be a significant uplift in Waverley for affordability reasons.

Whilst recognising that the Waverley Inspector’s comments are made at the examination hearings of a different plan, the University is aware that the comments are in the context of the same HMA, encompassing Woking, Waverley and Guildford together.

The result is that the OAN figure of 654 homes per annum in the current Guildford local plan (lower than the 693 per annum that was in the 2016 Submission Plan) is likely to be on the light side and may well have to rise to take account of a proportion of Woking’s unmet need and a greater uplift to address affordability.
The University notes that in this context it is likely that more land will need to be found to accommodate a higher OAN, and the plan therefore appears to be unsound on the issues of addressing OAN and identifying enough land to meet the requirements of development.

However, it is acknowledged that there are infrastructure constraints that require ‘backloading’ of much of the housing delivery towards the end of the plan period. A greater housing number would need to take account of this.

The plan addresses the infrastructure constraint and backloading by assuming that a proportion of the strategic site delivery around Guildford might spill over beyond the plan period. This approach may be appropriate for an element of additional provision.

In this respect, the University notes that the Blackwell Farm allocation (Policy A26) has been reduced in size since the draft plan (Regulation 18) consultation, with the removal of land to the south of the current allocation. There was a consequent reduction in the site capacity from 2250 homes to 1800 (approximately). Should the OAN be revised upwards from the 654 now proposed in the targeted changes, and GBC need to identify further land to meet a higher OAN, then the reinstatement of the part of the Blackwell Farm site allocation that was previously removed would help to meet an increase. The removal of the land was not because the land was unavailable (it is available) or of new evidence of hard constraints to development (no new evidence of previously unknown constraints has emerged), but because of a change in the green belt study methodology. The suitability, availability and deliverability of the land has not changed.

The re-allocation of this land as part of the Policy A26 requirement would see a total allocation of 2250 homes (an additional 450) of which it could be assumed that 750 (rather than 300) would be delivered beyond the plan period. This is well within the capacity of the whole site.

In respect of the likelihood that there will continue to be limits on the amount of land that can be found on previously developed sites in the urban areas, and that the most sustainable locations for growth will be around Guildford town, the plan should also amend the green belt boundary through this local plan review to identify safeguarded land that is to be released for development in a future local plan review. The NPPF allows for this approach, and indeed encourages it as it means that green belt boundaries are not continually altered with each plan review.

Whilst the Draft local plan in 2014 had some areas of safeguarded land, these have been removed and the plan currently makes no provision. It is the University’s opinion that the plan is not sound without an element of safeguarded land. This is because the plan will not be effective; it will not guard against the need for further green belt boundary changes in the next plan period. This point has already been made in the University’s previous comments on the 2016 Regulation 19 plan.

This current consultation is accompanied by an updated Green Belt Toic Paper (2017) that addresses the reasons why the Council has chosen not to provide safeguarded land. The University's comments on this updated topic paper on this issue are attached.

Housing target table

The University notes that the annual housing target table accompanying policy S2 sums to 9,810. The supporting text at 4.1.9a specifically states that the total in the table is 12,426. This is clearly not the case, and this should be explained.

Looking at the Housing Trajectory in the LAA addendum published with the plan, the following is apparent. The cumulative annual total from 2015/16 to 2033/34 (start and end dates of the plan) at 654 per annum is 12,426 (654x19). The total for the 15 years from 2019 to 2034 that are identified in the table is 9,810 (654x15).

Hence the statement in para 4.1.9a that ‘the figures set out in the Annual Housing Target table sum to a total of 12,426 homes’ is wrong, as that table starts at 2019/20 and does not include the provision from 2015/16 to 2018/19. This statement should therefore be corrected and a clear explanation be provided.

The University notes that the Housing Trajectory in the LAA shows a projected figure of 13,581 completions over the plan period, being 1,155 greater than the target (and the OAN). It is said that this over provision provides a buffer (of just less than 10%) and this gives flexibility to meet the target (OAN) of 12,426.
The University notes that the phasing starts late; the plan covers 2015-34 but the table says nothing about what has been provided 2015 to 2017 or will be provided 2017-19 (it starts at 2019-20). It is apparent from the Housing Delivery Topic Paper that completions and outstanding capacity since 2015 are included in the 13,581 provisions figure stated in the LAA. It would be helpful to have some reference to the whole picture in the local plan itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above text.

Attached documents: Green belt topic paper 2017 comments.pdf (91 KB)
During the plan period (2013-33), we will make provision for a minimum 13,860 new homes, 37,200 - 47,200 sq m of office and research and development (81a and b) floorspace and 4.7 - 5.3 hectares of industrial (81c, 82 and 88) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional 8 class jobs.

We also object to the proposed phasing of the annual housing target as set out in the policies. Such an approach is inconsistent with the framework that requires LPAs to significantly boost the supply of housing now. This is especially relevant in Guildford Borough which has been the subject of a long standing housing land supply deficit and has persistently under delivered against identified needs. Consequently we object to the annual housing target table included at the bottom of Policy S2.

Having regard to the site allocations listed in Table 1 (see also page 123), we consider our site represents one of the most logical locations for growth, having regard to its highly sustainable location (adjacent to Wanborough Station) and its enabling function in providing land for a secondary school that will meet wider needs across the western half of the Borough.

The revisions proposed above would help safeguard the policy in light of the latest CLG household projections and be consistent with paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

Proposed Changes:

The addition of the wording 'a minimum'.

Removal of the 'annual housing target' table at the bottom of Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The positive preparation test also requires plans to be objectively assess development and infrastructure requirements from neighbouring authorities.

POLICY S2: Borough Wide Strategy

Updated 2014 based household projections were issued by CLG earlier this month. These revealed an uplift in the household projection for the Borough from 499 dwellings per annum (2012 based projections) to 538 dwellings per annum. It follows that the need to maximise delivery at the strategic sites is yet more pressing given these revised projections. For these reasons, we propose that Policy S2 is amended to include the words 'a minimum' in front of the housing requirement, as per the below:

'During the plan period (2013-33), we will make provision for a minimum 13,860 new homes, 37,200 - 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 - 5.3 hectares of industrial (B1c, 82 and 88) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

We also object to the proposed phasing of the annual housing target as set out in the policies. Such an approach is inconsistent with the framework that requires LPAs to significantly boost the supply of housing now. This is especially relevant in Guildford Borough that has been the subject of a long standing housing land supply deficit and have persistently under delivered against identified needs. Consequently we object to the annual housing target table included at the bottom of Policy S2.

The revisions proposed above would help safeguard the policy in light of the latest CLG household projections and be consistent with paragraph 47 of the NPPF that seeks to boost significantly the supply of housing.

Proposed Changes:

The addition of the wording 'a minimum'.

Removal of the 'annual housing target' table at the bottom of Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S.2 Borough Wide Strategy

It is difficult for anyone to predict at this stage what the impact of the Brexit decision will be. What we do know is that most of Guildford should be highly protected from development thanks to long established planning policies such as the Green Belt which are defined and understood by the general public as permanent. It appears that this is not the intention in the draft Local Plan. 44% of the nationally important countryside within the Surrey Hills AONB lies within the Green Belt and about 75% of the area of the borough is further protected by the Thames Basin Heath SPA. Other land such as Registered Commons and Ancient Woodland are also not available for development.

CPRE objects to a draft local plan which calls for an increase in the number of residential dwellings by a quarter. This requirement for a housing figure of 13,860 dwellings is based on the West Surrey Strategic Housing Market Assessment (SHMA) prepared by GL Heam for GBC which is shown to be flawed. Green Balance has prepared for CPRE a review of this document for Guildford, Waverley and Woking Districts which maintains that the annual housing figure upon which the Borough Wide Strategy is based for Guildford is far too high. This renders the whole Local Plan for the District unsound.

GBC has not been able to prepare in time an acceptable plan for the Town Centre and the urban area of Guildford, causing undue emphasis to be switched to building on Green Belt countryside around the town. It is in our view unreasonable to embark on a radical transformation of the borough on the basis of an uncertain housing target which may well prove increasingly unreliable. CPRE OBJECTION.

It is in our view essential to reconsider the proposals made regarding the priority given to retail and office development, which we believe to be overstated, rather than to housing at an appropriate density on brownfield sites in the town. We question the allowance for the provision of other business employment land such as warehousing. It seems to us that retailing is undergoing a transformation illustrated by the loss of Austin Reid and BHS, the incursion of Aldi, M&S foodshops at rail and petrol stations, and on line purchasing and delivery of all kinds.

We maintain that the gap town of Guildford is a "special case" and should be recognised as such from a planning viewpoint because of its widely protected countryside which should be an ongoing constraint on development and preclude major structural change along the lines proposed. We feel obliged to emphasise again the permanence of the Green Belt, the Surrey Hills AONB and the SPA in this district. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development. National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development. Planning Policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces from caravan and traveller sites.

In view of this informal statement of national policy, we should like to see GBC reconsider the draft Local Plan that is now under consultation which undermines and erodes the Green Belt in Guildford Borough extensively. CPRE has major objections to the way in which Green Belt policy is being ignored by GBC using the "Objectively Assessed Need" figure for housing of 693 houses per annum as a justification for their recommendations. We object to this approach since we believe it is linked to evidence that is flawed as indicated by Green Balance and other specialists in this field.

The web site goes on to state that "latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989." This is an achievement which underlines the permanence of the Green Belt policy in stark contrast to what is proposed for Guildford. CPRE therefore objects strongly to the draft GBC Local Plan which it finds to be unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Object

The calculation of the SHMA is flawed as demonstrated above and must be reviewed as a priority.

Guildford is unfortunately a dormitory town for London and the growth of London should be met by the London Boroughs and not fed out into the surrounding Home Counties.

There appears to be double counting of the University’s requirements plus the growth that the University has experienced in the last few years is expected to continue. With the view that further education courses are becoming more expensive this continued growth is unlikely to happen.

In addition the economic growth that the SHMA is based upon is unlikely to occur due to the decision by the Great British public to exit the European Union. We are already seeing property development funds closing because of the concerns about the fallout from the decision on leaving the EU.

There is also a report prepared by GRA that demonstrates that the need for dwellings within the period of the local plan can be significantly reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11967  **Respondent:** 8979265 / Rachel Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15958  **Respondent:** 8979969 / Robin Bowen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposals for Guildford as I believe the proposals as drafted would change Guildford’s character forever.

I believe the assessment used by the council to identify housing need and to justify growth on such a scale, is fundamentally flawed and exaggerates need very significantly even before one takes into account the implication of the vote to leave the EEC. I thus object to its use and I support the Guildford Residents Association response (GRA) and oppose Guildford being expanded by one quarter. I also support the views of Cranley Road.

I object that brownfield opportunities are being ignored we need homes in the centre of town not 40% more shops.

I object to the plan being put forward to an inspector at this stage as I do not believe it is ready for this. Similarly I believe the transport evidence is not fit for use. As there are major transport issues unresolved such as another river crossing or a central bus facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13127  
Respondent: 8993121 / Shelagh Yeomans  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Planning for the borough – our spatial development strategy

I OBJECT to this policy.

- 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).
- It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated.
- External consultants and members of the public have provided detailed criticisms of the model.
- IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.
- The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860.
- Guildford residents will not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17140  
Respondent: 8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  
Agent: The Howard Partnership Trust (Vicky Lochead)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2 seeks to set out the Council’s strategy for planning positively to meet its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47). In particular, this policy focuses on the Borough-Wide housing target.

In relation to this target, we would note the following:

- The sufficiency of the assessed OAN remains to be established, including in the context of the Local Plan’s obligation to fully address unmet needs in neighbouring authorities;
- The Proposed Submission Local Plan has pushed the plan period back to 2013 to 2033 from 2011 to 2031. Given the significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2031 than is required or was previously planned for;
- The phasing of development in the Proposed Submission Local Plan ‘backloads’ the housing target. The overall housing target is equivalent to 693 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2022/23. It is already generating a significant backlog of housing need with only 242 homes delivered in the last full year for which data is available (2014/15);
- The spatial strategy relies on a smaller number of larger sites which, due to infrastructure and other phasing requirements, are often slow to deliver their targeted number of homes. The accompanying housing topic paper suggests that none of the proposed strategic sites will begin to deliver before 2020/21, with the majority of anticipated provision after 2027. Given the long planning period for such sites, even these targets may be ambitious.

As a result, we are of the view that the currently proposed approach will add to the Council’s backlog, does not plan to meet OAN in any reasonable timescale, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

Neither the Proposed Submission Local Plan itself nor the accompanying reports set out a proper assessment of the alternative approaches to meet the OAN, or the impacts of the very significant changes in site allocations since the previous Draft Local Plan (2014) on doing so. We are, therefore, of the view that the current strategy has not been properly justified.

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/1388  Respondent:  8993793 / Berkeley Homes Southern Ltd. (Sir or Madam)  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Berkeley Homes has been working alongside Howard of Effingham School for a number of years to deliver much needed housing and a new school to the area. These sites were allocated for development in the Draft Local Plan 2014 but refused planning permission by Guildford Borough Council in March 2016. Consequently, an appeal was lodged against this decision and a public inquiry was held in May 2017. The suitability of the sites has been demonstrated through the inquiry and accordingly, we believe the sites should be included in the Guildford Local Plan as Site's Allocated for Development - for the provision of a replacement Howard of Effingham School and up to 295 residential dwellings.

Following the recent appeal decision on land at Long Reach for the provision of a Suitable Alternative Natural Greenspace (SANG), Guildford has the opportunity to release housing sites in that part of the District and allocating the
Howard of Effingham/ Lodge Farm site would assist in delivering homes in this part of the District, including the provision of much needed affordable housing.

You will be aware that the Local Plan will be tested by the Inspector against the four tests of soundness (National Planning Policy Framework (NPPF) para 182), namely that it is positively prepared, justified, effective and consistent with National Policy. We set out below why we are of the view that the Proposed Submission Local Plan does not meet these tests in relation to the Spatial Strategy (Policy S2), Affordable Homes (Policy H2), the Green Belt (Policy P2), and Infrastructure Delivery (Policy IDl).

**Policy S2: Borough Wide Strategy**

Policy S2 sets out the council's approach to meeting its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47).

The Proposed Submission Local Plan has pushed the plan period back from 2013-2033 to 2015-2034. Given the Borough's significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2033 than is required or was previously planned for.

The phasing of development in the Proposed Submission Local Plan 'backloads' the housing target. The overall housing target is equivalent to 654 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2026/27. It is already generating a significant backlog of housing need with only 388 homes delivered in the last full year for which data is available (2015/16).

The proposed approach does not plan to meet OAN in any reasonable timescale, will add to the Council's backlog, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

The Council will also be aware that from November 2017, authorities that deliver below 85% of the borough's OAN will be expected to plan for an addition 20% buffer on their 5 year plan. Delivery of below 65% from November 2020 the presumption in favour of sustainable development in the National Planning Policy Framework would automatically apply (Housing White Paper 2017).

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

Sufficient, deliverable sites need to be identified to meet this increasing need for housing land, particularly in the east of the Borough, where capacity has been released due to the grant of permission for SANG land at Long Reach.

**Conclusion**

As a whole, the Proposed Submission Local Plan June 2017 is greatly flawed. The currently proposed phasing of housing and spatial strategy will not deliver Guildford's Objectively Assessed Needs within a reasonable timeframe, if at all.

The recently granted SANG at Long Reach also releases housing capacity in this part of the Borough and accordingly, the District wide allocations should be reviewed as a whole to ensure appropriate distribution.

The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown's Field (Site Al location 69) to provide homes and a bigger school. This allocation has been removed but remains an appropriate, deliverable and sustainable means of meeting the Borough's need for new infrastructure and homes.

We will continue to seek to work with Guildford Borough Council and Effingham Parish Council to bring forward the delivery of the Effingham sites and are happy to discuss the above points further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I am writing in support of the Guildford Residents Associations response to the Local Plan. I oppose the plans to expand Guildford.

I have known Guildford since the early 1970’s and have lived here since 1995. During this time the town has become overwhelmed by traffic. Until the traffic problems have been addressed there would appear to be little point in planning for more housing and retail space as there simply isn't the capacity to absorb more cars.

The physical geography of the town combined with its historical character are what make Guildford such an attractive place to live and work. The planned development of Green Belt land for homes will destroy this environment.

There would appear to be a real need for student housing without which our academic institutions will not thrive as appropriate housing for students is essential to their wellbeing whilst living away from home.

With so many shops standing empty, it would seem ill advised to plan for more retail space.

I would hope to see the traffic issues addressed as an absolute priority, followed by sympathetic development to meet identified specific needs. Brownfield sites should be used creatively before any consideration is given to development of farmland.

I oppose the plan and look forward to seeing a solution to the existing traffic problems and the redevelopment of under utilised existing buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the average annual target of 654 houses planned to be built over the period until 2034. The evidence in the Guildford Addendum Report (March 2017) is not soundly based. This high number is modelled from the demographic needs within the Borough representing some 85% of the overall projected increase.

The new evidence from GRA’s independent expert shows there is an over estimate of population growth of about 40%. The GBC proposal will result in needless loss of Green Belt and increased congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/96  Respondent: 9002593 / Brett and Susan Whitby-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As resident of Normandy of more than 30 years my comments are going to be about the local plan as it affects this area.

Under the proposed development in the local plan Normandy & Flexford, 2 beautiful rural villages, effectively cease to exist as what is proposed is basically a new town swamping the existing villages.

This is clearly a disproportionate level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15973  Respondent: 9007457 / Belinda Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There have been no consultations with the local people affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5120  Respondent: 9009025 / Peter Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---
In addition to the brownfield sites identified by the G.G.G. and others, there are huge areas of ground level parking in the town, land that could be used far more efficiently. The university should also be made to honour the promise it made, when given the 60 hectares of land at Manor Park, and build the accommodation for the 3,000 students still outstanding. In fact, it has been calculated that there is sufficient and on that sprawling site, to accommodate all the 7,000 students currently living in rented houses in the town, thus freeing up some 2,000 houses for Guildford families. This would have the added benefit that the houses would pay council tax, which, as houses in multiple occupation, they currently do not.

I also object to the way GBC is attempting to deal with the shortage of affordable housing in Guildford. In his talk here last year, the eminent planning expert, Alan Wenban-Smith, said that to expect commercial developers to build anything like 40% affordable housing, on prime Green Belt land, that they have paid premium prices for, was completely unrealistic. 'It just isn't going to happen' he said.

He also pointed out that it is actually hugely more expensive to build on greenfield sites, than on brownfield sites, because it is so very costly to have to put in all the infrastructure and services, whereas with brownfield sites, some, or any of them, will already be there. So if it is affordable housing you are seeking to provide, surely you have to go for the least expensive sites, not the most expensive ones. You are left wondering whether GBC is either very naive about how commercial developers operate, or whether they are not really serious about providing affordable homes.

As a resident of Wood St. Village, I particularly object to the proposed huge development at Blackwell Farm, on the northern slopes of that beautiful and iconic feature of Surrey's landscape, the Hog's Back.

I object for many reasons. Firstly, because the N.P.P.F states that the Green Belt should be considered permanent, the most modest definition of permanence being defined as at least 20 years, [which many people may consider as not very permanent at all]. But even by that weakest definition of permanence, the university is surely not entitled to apply to push back the Green belt till 2024, as it was pushed back for them in 2004 when they were given the 60 hectares of prime Green Belt land at Manor Park. The N.P.P.F. also states that planners should choose land 'of low environmental value' and 'refuse permission when it would have a detrimental effect on ancient woodland'. The whole site is either A.O.N.B. or A.G.L.V., it is bordered by ancient woodland to the east and to the west, and to the north by common land designated as an S.N.C.I. I cannot see how, by any stretch of the imagination, that could be described as being 'of low environmental value'. Walking across the proposed site affords the most extensive panoramic views of the north side of the Hog's Back A.O.N.B., in it's A.G.L.V. setting, to be found anywhere between Guildford and the Farnham conurbation. There is no view like that in the whole of East Anglia.

The whole area is a green lung, mitigating the air pollution in Guildford, due to the prevailing westerly winds. It is also highly productive farmland, and it has been estimated it produces something of the order of 1.5 million loaves of bread each year. Planners are also required by law to do what they can to maintain biodiversity, are they not? I object strongly that this whole local plan, by concentrating development on greenfield sites, totally fails in its duty, in this regard. Local wildlife experts have observed over 50 species of wild birds on Blackwell Farm, including four species whose decline has been so drastic in recent years that their special protection is specifically mentioned in the N.P.P.F. These are the skylark, the yellowhammer, the linnet, and the lapwing. I have personally seen all these species on the site in recent years. Our green spaces are a precious and finite resource, shown by recent studies to be of great psychological benefit to the nation, and should only be destroyed as a last resort, not as, in this case, a first resort, when the university has ample planning permission to build on brownfield sites at Manor Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1452  **Respondent:** 9009025 / Peter Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )
The second important development since the last consultation is the publication of the INRIX report, which revealed that Guildford has the worst traffic congestion of any town in the whole of the U.K., and worse than many major cities like Glasgow, Cardiff, Belfast, Liverpool, and Bristol, making it the sixth worst congestion hotspot in the entire U.K. This independent report completely vindicates what many people have been saying for years, that Guildford is not a suitable site for mass development on the sort of scale proposed in the local plan. Nor will the modifications to the slip roads on the A3 significantly improve the situation, as the main problems are the sheer weight of traffic, which will only get heavier, due to the large developments at Aldershot, Farnborough, Cranleigh, Dunsfold, and Blackwell Farm, making the congestion at the junction of the A3 and A31 even worse, and the fact that the A3 narrows to four lanes through Guildford. So I object to the changes to the local plan because of the intolerable traffic congestion they will cause, as now confirmed by the INRIX report.

The INRIX report also deals with the question of the supposed government pressure on local authorities to just keep building more and more houses. Surely no government minister, with any common sense, on being shown it's findings, is going to think Guildford is a suitable site for mass development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1366</th>
<th>Respondent: 9009153 / Lindsay Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to the disproportionate amount of development in one area of the borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. I object to the limited consultation period</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. I object to the last minute inclusion of new sites with less than two weeks notice</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1436</th>
<th>Respondent: 9009185 / Diana Elliott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The second important development since the last consultation is the publication of the INRIX report, which revealed that Guildford has the worst traffic congestion of any town in the whole of the U.K., and worse than many major cities like Glasgow, Cardiff, Belfast, Liverpool, and Bristol, making it the sixth worst congestion hotspot in the entire U.K. This independent report completely vindicates what many people have been saying for years, that Guildford is not a suitable site for mass development on the sort of scale proposed in the local plan. Nor will the modifications to the slip roads on the A3 significantly improve the situation, as the main problems are the sheer weight of traffic, which will only get heavier, due to the large developments at Aldershot, Farnborough, Cranleigh, Dunsfold, and Blackwell Farm, making the congestion at the junction of the A3 and A31 even worse, and the fact that the A3 narrows to four lanes through</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Guildford. So I object to the changes to the local plan because of the intolerable traffic congestion they will cause, as now confirmed by the INRIX report.

The INRIX report also deals with the question of the supposed government pressure on local authorities to just keep building more and more houses. Surely no government minister, with any common sense, on being shown it's findings, is going to think Guildford is a suitable site for mass development..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9954  Respondent: 9039745 / Nicholas Palmer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please give more due consideration to the draft plan and use other means of producing more homes for the supposed housing shortage.

There is never any mention of the old CEGB site at the bottom of town it had a high rise building of offices surrounded by the same surely that would create many affordable dwellings on a high rise basis without owners needing cars particularly with the close proximity of railway and buses.

What is happening to address the main core problem of the Supposedly Housing Shortage that being OVER POPULATION or perhaps this is a matter for a higher authority

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8116  Respondent: 9042753 / Julia Trinick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The number of houses proposed is unsustainable with the infrastructure.

I cannot see the need for so many houses. Why do we need 3x as many as we are building now? We haven't seen the backup but it does seem far too many!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6861  Respondent: 9047265 / Clare Hewlett  Agent:
I am a resident of West Horsley and wish to register objections to the revised Draft Local Plan. I understand the need for some additional housing but feel that the proposals now being put forward are inappropriate in scale and have not been properly justified. Indeed I understand that even the Council itself do not know the basis on which the number of new homes in the Borough has been calculated, which cannot give any trust at all that it is a sensible number and not a developer’s wish list! A large number of new homes will provide a ‘pull’ factor into the area from Greater London which would not have existed otherwise. Such a demand will never be satisfied.

- I object to the manner in which a total figure of over 13,000 additional houses in the Borough has been presented with no justification of the actual need.
- I object to the fact that a very large proportion of the proposed new housing should be in the Green Belt and/or on agricultural land which will be lost for ever
- I object to the disproportionate allocation of housing to the Horsley area, the opposite side of the Borough from areas of economic development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum in order to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by myself, which unequivocally rejects GBC’s Forced Growth policy.
Therefore I object strongly to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11138  Respondent: 9050529 / Suzanne Johnston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The level and concentration of development cannot deliver economic, social or environmental conditions - the level of congestion is already high, mitigated only by areas of green belt. I believe the plan rides roughshod over greenbelt and as such will fundamentally change the character of the countryside here without delivering the benefits it promises.

I believe that the local plan is fundamentally flawed and should be much more rigorously tested before it is allowed to proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6033  Respondent: 9051617 / Carol Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We need to develop more Brown field sites into integrated variety sites

Homes- Starter, family, down-sizers, green, especially social;

Leisure and community spaces and places which are accessible by foot, cycle, car or public transport.

We are very lucky to live where we do, we need to share, compromise but not lose its fundamental greenness

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2909  Respondent: 9056513 / Edmund Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to you to object wholly to the Local Plan June 2016.

I will head my objections and then explain these objections in more detail.

- Policy, Site Proposals and NPPF Framework
- Housing Density
- Drainage
- Education
- Infrastructure
- Summary

**Policy Site Proposals**

I am horrified that the Plan targets the Horsley’s with a 35% increase in homes, the highest in the borough. This would remove the two separate villages from the Green Belt and merge them; thus increasing urban sprawl. The Government’s own Housing and Planning Minister, Brandon Lewis, stated housing demand is not enough to change Green Belt boundaries. The NPPF clearly states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. This alone shows the Local Plan evidence to be flawed. The estimate for housing needs would bring more people into the Borough not providing local needs for those already here.

**Housing Density**

The density of proposed homes is far too great and would merge two existing separate villages into a town. This together with the proposal at Wisley (another town) would kill off our local community, with vast swathes of Green Belt lost forever. Many people visiting the area comment on its natural beauty and quaintness. This would also be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/9540  **Respondent:** 9059713 / J.M. Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am much concerned that, if this plan is approved, development will be "approved in principle".

If this is so, it would appear to go against all ideas of local democracy. What mechanism will there be for any serious comments to be heard & considered in specific cases?

I understand the important need for housing, etc., but environmental considerations are also vital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/11424  **Respondent:** 9062913 / Susan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11566  Respondent: 9062913 / Susan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the inclusion of all Green Belt sites, and particularly the following sites, on the basis that (per the policy objections listed above) the need for use of Green Belt land is unsustainable and exceptional circumstances have not been adequately demonstrated for their removal from the Green Belt, as required by NPPF 83 inter alia:

A25 Gosden Hill
A26 Blackwell Farm
A35 Wisley
A38 – A41 Land around West Horsley
A42 Clockbarn Nursery
A43 Garlicks’ Arch
A43 a Burnt Common
A44 Send Hill
A46 Land between Normandy and Flexford
A47 West of the Paddocks, Normandy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

The OAN “objectively assessed need” figure of 12,426 is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However, it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 overestimates population growth for Guildford.

The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown...
by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

Around 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

House of Commons Briefing Paper; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1915</th>
<th>Respondent: 9062913 / Susan Parker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1925</th>
<th>Respondent: 9062913 / Susan Parker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

It appears that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

I feel much of the updated local plan still appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.
Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9619  Respondent: 9069121 / E Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are a number of buildings left unoccupied all around the Guildford area and it seems criminal to create further environmental problems by new builds. Indeed it seems to serve corporations who wish to make a profit as opposed to providing homes for people who cannot find affordable housing in this area.

With the lack of opportunity for peer review of the process, let alone public examination of it, the document and its conclusions cannot be considered to be “objective”. Any plan based on this must be considered to be unsound and I therefore object to it in the strongest terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8689  Respondent: 9070241 / Adrian Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Disproportionate number of new houses for local facilities: I strongly object to the number of new houses proposed within the Horsleys and surrounding villages namely Ripley, Send and Clandon. Within the Horsleys, the schools, doctors and train stations are struggling to cope with the Current demand. My family commute to London from Horsley and the trains and car parking are almost at maximum capacity. Assuming that every new house has at least two cars, this means potentially 6000 more cars within a three mile radius of the villages. The impact on the local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will be affected.

The proposed development plan is disproportionate to the size of the villages and is an overkill. It is by directly out of proportion to the size and availability of Brownfield sites already available for development.

I sincerely hope you, the council, will consider my objections and avoid destroying the Borough's Green Belt which is precious and I fear for its demise. Our British countryside needs to be protected for future generations of population, animal, bird and plant life. Please protect our environment from increased pollution and flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S2: Borough Wide Strategy (Including Tables 1 and 2 & the Land Availability Assessment)

Object (not effective, positively prepared nor consistent with national policy in respect of NPPF paragraph 182)

The overall proposal to allocate land to meet the OAN is supported. The GBLP is clearly positively prepared in spirit.

WPI does however maintain a technical objection to draft policy S2, as in application there is a notable shortcoming with respect to accounting for the actual planned growth, development phasing and contingency. There are also inconsistencies throughout in respect of how the Land Availability Assessment (LAA) relates to the proposed policy, the Sustainability Appraisal (SA) and other supporting documents such as the topic papers.

Planned growth and contingency: As set out within Policy S2 the OAN over the plan period is 693 x 20 years = 13,860 homes (2013-2033). It is typically the case that adopted plans include a circa 10% contingency for non-implementation. This is to reflect unimplemented consents and the number and scale of proposed allocations, the vast majority of which are still to progress through planning. It is well known, for example, that the Slyfield Regeneration Area will deliver homes toward the end of the plan period. In addition, there are obvious complexities with some Town Centre sites, notably at the station, exemplified by the recent refusal of planning permission (ref. 14/P/02168).

Draft policy S2 only indicates that the plan "will make provision for 13,860 new homes". This is not a factual statement. It is also not positively prepared, as the plan includes additional provision and hence the emerging policy is ineffective. In addition, the draft policy makes absolutely no references to the sources of housing supply in the period 2013-2018. Instead it includes a phased annual housing target (range 500 dpa to 790 dpa) in the period 2018–2033. This is also ineffective, as the Plan Period is clearly 2013-2033.

There is no requirement or allowance in the NPPF to artificially set a five-year housing land supply period, some two years hence. The NPPF is clear that Local Authorities must maintain a rolling five-year housing land supply.

Phasing: Based upon an annual delivery rate of 693 dpa, draft Policy S2 indicates that housing delivery will not reach parity until 2028/29. In other words, there will be a planned under supply for the first 15 years of the 20-year plan period. WPI understands the rationale behind the phased or stepped approach to housing delivery as set out within the LAA and justified within the Housing Topic Paper. However, this approach requires that GBC make every effort to support the delivery of dwellings from the strategic sites as early as possible in the plan period.

The overall phasing of the Wisley new settlement should reflect the phasing provided in these representations (see comments on draft allocation A35). This should be within the housing trajectory of the GBLP and associated evidence base.
In respect of Table 1, it should be clarified whether the homes indicated in the second column include C2 uses, as well as C3. The allocation for the Wisley new settlement should be to deliver approximately 2,000 homes (C3 use) in addition to 100 homes for the elderly (C2 use).

The Guildford Annual Monitoring Report 2014/15 (October 2015) shows that there is currently 2.4 years' housing land supply within the Borough when calculated against the OAN figure of 693 dpa (West Surrey SHMA, September 2015). This figure has been confirmed in a recent planning appeal decision relating to development at Ash in respect of which planning permission for 56 dwellings was granted by the Inspector (APP/Y3615/W/3135326).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160715_Local_Plan_Reps__July_2016__and_Appendices.pdf (11.0 MB)

<table>
<thead>
<tr>
<th>Policy/ Section / page / para</th>
<th>Original Changes requested (July 2016 Representation)</th>
<th>Understanding of changes shown in the Focused Amendments (June 2017)</th>
<th>WPI Comments (Updated Representation)</th>
</tr>
</thead>
</table>
| Policy S2: Borough Wide Strategy Page 26 | Draft policy S2 should refer to ‘at least’ 13,860 dwellings. The draft policy should refer to the following sources of land supply:  
- Completions in the period 1st April 2013 – 31st March 2016  
- Existing Commitments unimplemented at 1st April 2016  
  • Proposed allocations to be delivered in the period 2016-2033  
  • Proposed windfall allowance in the period 2013-2033  
The phasing allowance in the plan should commence in 2016 and not 2018. | (Pages 30 and 31)  
An “at least” requirement has been added. However, the housing requirement has reduced to 12,426 by 2034 from 13,860 by 2033.  
Changes are also made to composition of housing, for example, requirements from urban areas have changed from “over 2,800” to “approximately 3,000” units.  
Changes are also made to the employment space requirements.  
The four bullet points sought in respect of supply have not been included.  
The phasing allowance in the policy has changed from commencement in 2018 to commencement in 2019/20. There is however no detail provided in relation to phasing for Wisley New Settlement. | Welcome change to the reference to ‘at least’ and also ‘approximately’.  
Welcome change on overall housing provision. All other objections withdrawn. |

Comment ID: pslp171/2747  
Respondent: 9079393 / Wisley Property Investments Ltd.  
Agent: Savills (Jim Beavan)  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The overall phasing of the Wisley new settlement should reflect the phasing provided in this Representation (see comments on draft Allocation A35). This should be within the housing trajectory of the GBLP and associated evidence base.

Table 1 of the GBLP should be clarified, to outline the numbers of planned houses as ‘approximates’ and whether this includes C2 uses in addition to C3. The delivery of the Wisley new settlement is noted in plan period 1-15 years. This is supported. The intended delivery is entirely within the period 2017-2031.

Table 1 has been removed from the Plan, as has Table 2 (although this is now included in Appendix B at page 306). Welcome change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9824  Respondent: 9080737 / Andrea Wright  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield sites

We need to reassess the brownfield sites we currently have and assess whether they are being appropriately used and whether there are more opportunities there that haven't been fully explored e.g. reconsider how the town centre should be redeveloped and include more housing and fewer shops.

I urge you to reconsider this plan to prevent the loss of the beautiful character of our wonderful town and prevent the loss of the greenbelt surrounding it. Once it's gone, it's gone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5423  Respondent: 9081089 / William D Barker OBE  Agent:
I object to the disproportionate distribution of houses across Guildford Borough. The NE has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Borough employs consultants who allegedly have planning expertise, but have done so without taking account of Surrey County Council highway planners' views, the costs involved of improving the infrastructure currently outweigh their financial capability.

The methodology is also flawed in my view, as this plan has been formulated without regard to Village Neighbourhood Plans. Surely logic would suggest planning is best formed by bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to a suggested increase of housing in West Horsley of 35%.

Please do not carry forward a flawed plan which sees 593 new houses in the Horsleys within 5 years of adopting the plan. I recognise the borough needs new housing but new housing does not need to be put on the Green Belt. Please redevelop brown field sites and listen to village neighbourhood plans. These plans are written by the people who know the villages best and know where new housing could be included without ruining our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14568  Respondent: 9096289 / John Cox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Nearly 70% of the proposed housing is on greenbelt land, but the government’s national policy planning framework indicates that new housing does not constitute the very special circumstances which would justify this.

There is a mismatch between new economic development sites in the Borough and the proposed housing developments.

For example a 35% increase is proposed for West Horsley.

The percentage increase in housing in West Horsley is higher than anywhere else in the Borough, but we are not told why and the densities proposed are much higher than those in the village now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3778  Respondent: 9097409 / Lindsey Fisher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield

Why aren't more of the Brownfield Sites being used for housing before taking the Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17266  Respondent: 9228769 / Cathryn Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Housing Numbers**

While I appreciate the need for additional housing in the borough, I fail to see why the Horsleys should have a population increase that is almost 70% higher than the population estimate increase for the rest of the borough. It is clear that the council have decided to put homes here and NOT spread them across the rest of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1168  **Respondent:** 9242017 / Matthew Brewerton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to write in support of the draft local plan which is currently in the public domain for consultation.

Guildford has some difficult requirements. As is well known through the borough, housing is in short supply and therefore very high cost - prohibitively high for many. We do of course have much beautiful green open space which would be wonderful to protect completely. However, as the plan shows, we need to take a pragmatic approach to balancing the needs of all and taking small sacrifices in the green belt to achieve this.

I hope that after many hours of discussion and review we can finally get a local plan approved, submitted and accepted. Whilst we spend so much time talking about what Guildford needs, we are sadly falling behind neighbouring boroughs and not doing our wonderful town justice. I urge the council to push ahead with this plan, there will never be a plan that is universally accepted. If we try and wait for that, our town will quickly become irrelevant. For a great town like Guildford, this is my biggest fear.

I, like many others I know, want to start my family in this town and allow them to appreciate all the wonderful benefits it has to offer. Please take Guildford out of limbo and allow us to maximise it's potential.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4475  **Respondent:** 9298465 / Peter Grover  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 - Borough wide strategy

OBJECT. Again, the huge number of houses makes no sense for Guildford, a 'gap town' with serious movement restrictions and natural constraints. The Council has the right not to build on the Green Belt but has not taken it. The HMA figures have been widely and rightly criticised for many reasons but scrutiny of the methodology has been denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6723  Respondent: 9299745 / Simon Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that most new houses designated in the plan will be outside the local urban areas, forcing the increase in rural or semi urban areas which are far more likely to struggle to cope with sudden increases in population. There seems to be very little consideration given to viable alternatives better suited to an increase in affordable accommodation, such as Guildford. This is recognised as an area that can benefit from redevelopment of specific urban areas for lower cost housing rather than solely focus on developing green belt land

The plan states that the proposals will have particular regard to 'the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape'. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Former Wisley Airfield (FWA/TFM), an area that at present has only 0.3% of the population of GBC. I don’t see how this can be justified as the proposal recommends increasing the number of properties in the West Horsley alone by over 34% without any significant investment in infrastructure to the surrounding areas. For example, both local primary and secondary schools are hugely overcrowded and oversubscribed and want to instigate plans to expand to at least enable them to meet existing demands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18  Respondent: 9322113 / John Lillywhite  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to protest in the strongest possible terms to the proposed development plans around East and West Horsley. The plans represent too much development in too short a period for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14937  Respondent: 9327009 / sp2 Consulting Limited (Stephen Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1769  Respondent: 9327201 / Andy White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The main threat to Guildford’s economy is the lack of infrastructure. With perhaps the exception of the Surrey Research Park, all of the other large employers, such as Game, could operate anywhere in the country. If their workers cannot get to work or meetings are constantly starting late as visitors are held in traffic, then there is nothing to stop the Companies moving. They are here for all that Guildford and its surrounding environment has to offer. If this is diluted by unnecessary development and its impacts then the economic future of the Borough is at risk. This is now partly acknowledged by the Plan but still the housing numbers remain largely unaltered. The Plan now acknowledges the existing infrastructure shortfall but still proposes very significant increases in housing with no deliverable proposals to address the shortfall, let alone cope with all the extra demands a near 10% increase in population would make.

The reduction in housing numbers is largely, and is very much the case for the Gosden Hill Farm site, just moving the completion date. The final development would still be of the same size as before, just completed after the proposed plan period.

Nothing has been done to address the traffic issues for Burpham that 10,000 plus vehicles per day [2,000 homes x an average of 2 per home x 2 (away/home) plus workers/children] plus the additional traffic caused by the Park & Ride proposed for Gosden Hill Farm. With only one entrance and exit for the site the proposal is unsustainable.

Whilst additional housing is needed the figures produced by the SHMA are in error and do not account for the EU Referendum result or use latest ONS population projections. The figures produced by the Guildford Resident Association own SHMA are more sustainable and deliverable. The Plan also does little to provide homes that are actually affordable for key sector and other workers. The 80% of normal market price definition does little to help with Guildford house prices. Also i do not feel it is possible to build sufficient homes to reduce the prices to have a useful effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2691  Respondent: 9327329 / A2 Dominion Group  Agent: Judith Ashton Associates (Judith Ashton)
The level of housing growth proposed in Policy S2 of the PSLP – the Objectively Assessed Housing Need and the unmet needs of the HMA

A) The OAHN

1.1 Policy S2: of the PSLP sets out the spatial development strategy for the Borough. It includes the overall housing requirement, which is set at 12,426 dwellings for the period 2015-34 – an average of 654dpa. This is some 1,434 dwellings less than the 13,860 dwellings proposed for the period 2013 – 2033 (693dpa) in the Reg 19 PSLP of June 2016, and is based upon the SHMA Addendum of 2017 which seeks to update the OAN calculation for Guildford using the 2014 population projections.

1.2 Whilst we support the use of the 2014 population projections, these have to be considered in the context of the Housing Market Area (HMA) as a whole, which, as set out in the 2015 SHMA, includes Waverley and Woking. Unfortunately the 2015 SHMA has not been updated to reflect the 2014 population projections across the HMA as a whole. The Addendum of 2017 is for Guildford only and does not demonstrate how the projections play out across the HMA as a whole and thus the implications for the HMA.

1.3 Paragraph 47 of the NPPF is clear that ‘47. To boost significantly the supply of housing, local planning authorities should:

● use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;’

1.4 Furthermore, as set out in PPG, population projections are but the starting point for determining the OAHN. In this context we note that the 2015 SHMA identified a baseline demographic need for 517 dwellings per annum (dpa), based on the 2012-based Household Projections, rebased to take account of ONS 2013 Mid-Year Population Estimates[1]. Paragraph 8.3 of the 2017 SHMA Addendum indicates that based on the ONS 2014-based Sub-National Population Projections the baseline demographic need is for 557 dwellings per annum in the borough. Thus there has in effect been an increase in the baseline need from 517dpa to 557dpa.

1.5 The 2015 SHMA sought to adjust the baseline population projection of 517dpa having regard to economic growth and housing need, affordable housing and market signals, and the need to provide for the demand for student accommodation, to arrive at an overall OAN of 693dpa. The difference in the level of uplift applied to the baseline figure to arrive at the overall OAN is set out below. It is clear from the figures below that the level of uplift to address Economic Growth and Housing Need has reduced significantly and that it is this that has for the most part reduced the overall OAN from 693dpa to – 654dpa.

[Table]

1.6 The consideration of economic factors in determining the OAHN is to ensure that there is sufficient housing to support the employment growth scenarios set out in the Plan. The fact that Guildford Borough Council (GBC) appear to have decided that economic growth in Guildford will not be as strong as previously expected does not necessarily mean the Council should reduce its housing requirement accordingly. It has to assess the matter in the context of the HMA as a whole and consider the implications of reducing the housing requirement in the context of the demographic baseline and affordability issues. To do otherwise would ignore wider trends and market signals which as set out below clearly demonstrate a need to increase, not decrease the housing requirement.

1.7 In the context of the above PPG indicates that housing need numbers suggested by household projections should be adjusted if market signals or other market indicators point to an imbalance between the supply and demand for housing. The 2017 SHMA update acknowledges that:

- A significant number of households in the Borough – 517 per annum - require financial support to meet their housing needs.
- To meet the affordable housing need in full based on 40% affordable housing delivery would notionally require almost 1,300 homes per annum to be built across the Borough.
- Longer-term house price growth in the Borough has been above regional/ national averages
- Lower quartile house prices are 11.5 times earnings in the Borough

1.8 Paragraph 8.14 of the 2017 SHMA addendum goes on to advise ‘The evidence conclusively supports an upward adjustment to improve affordability, taking account of the market signals and affordable housing needs evidence.’ Yet only a 9% increase to the housing requirement (as adjusted to address economic growth) is proposed to address the issue of affordability. Given the above we do not consider the adjustment to the Initial Demographic Projections to provide for Improving Affordability to be realistic or justified.

1.9 In the context of the above we note that the Local Plans Expert Group has advised the Government that where the house price median ratio is above 8.7 then a 25% uplift should be applied. In Guildford the lower quartile ratio stands at 11.5[2], while the median ratio stands at 12. At present the PSLP provides a 9% adjustment which equates to an additional 52 homes a year. We consider that the affordability adjustment needs to be much greater i.e. 25% in order to begin to have a material effect on improving affordability.

1.10 In this regard we note that at the recent Waverley LP examination the Inspector recommended a market signals uplift of 25% above the 2014 population projections (plus 4.7% vacancy rate) to improve affordability in line with the requirements at NPPG (ID2a-019). As Guildford is in the same HMA and as the affordability issues are not dissimilar we believe a comparable uplift should be applied here. Thus the true OAN is circa 746dpa.

1.11 The failure of the PSLP to look to address the needs of London is also in our opinion foolhardy and prejudicial to the credibility of overall housing strategy. One cannot ignore London and its effects in terms of housing requirements across the South East. The Inspectors report into the Further Alterations to the London Plan is clear as to the need for the GLA to engage with the authorities in the South East and the fact the housing strategy advocated in the London Plan is likely to be material to the preparation of plans outside London. Whether or not this is ultimately addressed through an uplift to address market signals, the SA should look to address this to ensure the PSLP is seen to be positively prepared, justified and effective.

B) The unmet needs of the HMA

1.12 The DTC Topic Paper (paragraph 4.41) notes that: ‘There is currently unmet need arising within our HMA from Woking Borough Council. It has an adopted housing requirement of 292 dwellings (2010 – 2027) against an OAN of 517. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes’. At the recent Waverley LP examination the Inspector recommended that Waverley accommodate 50% of Woking’s unmet need. i.e. 1,575 dwellings. During the debate on the unmet need he also made it clear that in his opinion Guildford BC should be looking to accommodate a significant proportion of the residual unmet need. Even if one were to suggest that only 60% of the remaining unmet need (i.e. 945 dwellings) were to be accommodated in Guildford that would equate to an additional 50dpa (945/19). Such that the overall housing requirement should, as set out below be circa 800dpa (15,200 dwellings across the plan period (2015-2034)).

1.13 If the full extent of the remaining unmet need from Woking were to be accommodated (821 dwellings – 75dpa) the overall requirement would be 15,599 (821dpa).
1.14 In the context of the above we note that the topic paper on the DTC advises at paragraph 4.49 that: ‘Pursuant to the MoU, the three authorities have also agreed a Statement of Common Ground on housing delivery (Appendix 5). This recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full.’ Appendix 5 of the topic paper on the DTC is however based upon GBC providing for 693 homes per annum not the 654 now proposed. No updated DTC statement has been published.

1.15 We also note that the Topic Paper on the DTC states at paragraph 4.50 that GBC ‘do not consider that we can sustainably accommodate any unmet need arising from Woking’. This is however the wrong approach. The fact is GBC’s capacity to accommodate 564 dpa (+) is a different matter to its assessment of its OAHN. The SA should be identifying the need and then assessing whether the authority have the capacity to accommodate it given the findings of the LAA etc. not determining the OAHN based upon the boroughs alleged capacity to accommodate it. The council’s decision to provide no additional housing over and above the 564 figure to address the unmet needs of Woking needs to be justified if the plan is to be seen to be positively prepared, effective and consistent with national policy.

1.16 Given the above we do not consider the basis for the calculation of the OAHN to be realistic or justified. The issue of how to deal with any necessary uplift to address Economic Growth and Housing Need, and Affordable Housing and Market Signals, does not reflect the advice in national policy, and suggests a plan that has not been positively prepared. Likewise the approach to the issue of the unmet needs of Woking does not in our opinion reflect the advice in national policy guidance, rather it suggests a plan that is not positively prepared, will not be effective and is thus unsound. The overall OAN should be adjusted to circa 746dpa, and the plan should look to provide for an additional 50dpa (minimum) to meet Woking’s unmet needs.

2 The rational for a higher level of housing growth.

2.1 The evidence base provides various reasons why, in addition to the issues of an uplift to address Economic Growth and Housing Need, and Affordable Housing and Market Signals, that the housing target should be significantly greater than proposed in the PSLP. These include the following:

1) Enterprise M3 have made it clear that Guildford is the main town and economic powerhouse for the Borough and plays a key part in the wider Enterprise M3 area; and that it needs to be able to accommodate new development to ensure the future vitality and prosperity of the town and its surroundings.[3] They have also stated: - ‘Elmbridge, Guildford and Runnymede remain the least affordable locations in the Enterprise M3 area... The cost of renting a home is also relatively high in the Guildford area (some 20% higher than the average for Enterprise M3 area overall). We therefore welcome Local Plan policies that encourage development of more homes...’[4]
In commenting upon the 2016 PSLP Enterprise M3 state:- ‘On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns.’[5]

2) Paragraph 6.3.10 of the 2016 SA states that: ‘Guildford Borough Council is committed to delivering its OAN figure [693dpa at the time], having established that there is no potential to justifiably ‘under-deliver’ and rely on neighbouring authorities to meet the shortfall (under the Duty to Cooperate). Whilst Guildford Borough is heavily constrained environmentally, it does not stand-out as relatively constrained in the sub-regional context [6] This conclusion is reached on the basis of Duty to Cooperate discussions, past SA work (notably spatial strategy alternatives appraisal in 2013/14 – see discussion above), an understanding of precedents being set elsewhere, and other sources of evidence. It is evidently the case that under-supplying in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA. There is an argument for under-supplying to be preferable from an environmental perspective; however, this argument is far from clear cut given an assumption that unmet needs would have to be met elsewhere within the HMA (i.e. within Waverley, which is heavily constrained) or elsewhere within the heavily constrained sub-region. For these outline reasons options that would involve planning for a level of growth significantly below that necessary to meet OAN are considered unreasonable at the current time.”
Which would suggest that there is the capacity to accommodate more than is currently planned for to try and assist in meeting the unmet needs of others/ address the issues of improving affordability/ to take ac-count of market signals etc.

3) P44 of the 2016 SA indicates that: ‘There is a strong argument for ruling out the ‘bookend’ options, notably - Option 1[7] - which performs poorly in terms of socio-economic objectives, with a number of significant negative effects predicted;

It also advises that; ‘As such, it can be seen that there is no clear best performing, or ‘most sustainable’, option. Rather, there is a need to establish a preferred approach after having determined how best to ‘trade-off’ between competing objectives, and in-light of wide ranging perspectives.’ Paragraph 8.2.1 of the 2016 SA continues: ‘The Council’s preferred approach is Option 4,[8] which the appraisal finds to perform relatively well, in that it stands out as performing well in terms of certain objectives (notably ‘communities’ and ‘employment’) and does not stand-out as performing poorly in terms of any objective.’

4) The 2016 SA goes on at p46 to advice:

‘Housing - The preferred option performs well as it will put in place a strategy for meeting the borough’s OAN; however, it is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking). Higher growth options would perform better, but would be problematic in terms of a range of environmental (and transport) issues/objectives, given local sensitivities. It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context. This is the finding of the SA work, but it is also worth noting that the Council’s work to consider safeguarding options has also led to the same conclusion.’

2.2 Despite the above the findings on the preferred approach, the PSLP 2016 only sought to deliver 13,860 additional homes by 2033. In this respect we note that:

1) Paragraph 10.5.1of the 2016 SA states:

‘The proposed housing growth quantum, determined in order to provide for objectively assessed needs (OAN), performs well on the basis that the OAN figure was determined after having taken into account the number of homes needed locally to ensure that growth in the local workforce keeps pace with jobs growth. However, there are arguments to suggest that a higher level of housing growth could have merit, recognising that Guildford residents will also work in Woking and elsewhere in the Functional Economic Area (FEMA), and that at the FEMA-scale there is set to be an undersupply of housing (albeit there may also be an undersupply of employment land / jobs growth).’

2) Paragraph 10.9.12 of the 2016 SA states:

‘The plan sets out to meet the objectively assessed housing need (OAN) figure identified for the borough by the SHMA, and as such significant positive effects are predicted. However, the decision has been taken not to deliver a higher level of growth in order to address undersupply at the housing market area (HMA) scale (emanating from Woking). There are also some question-marks regarding the housing trajectory (and in particular the supply of housing in the early part of the plan period); however, these are detailed matters that will benefit from open discussion during the plan’s examination.’

[7] Option 1 OAN (693 dpa) plus 0% buffer i.e. 13,844 dwellings across the plan period
[8] Option 4 – 2016 SA - OAN (693 dpa) plus 14% buffer i.e. 15,844 dwellings across the plan period

2.3 Paragraph 8.2.1 of the 2017 SA advises that the councils preferred choice is option 1 i.e. OAN (654 dpa) plus 9.4% buffer which equates to 13,600 dwellings across the plan period. Paragraph 10.9.15 of the 2017 SA indicates that: ‘The proposal is to provide for a reduced housing quantum; however, as this is in response to a lowered OAHN figure, it is not possible to conclude that this is a ‘negative’ in terms of ‘Housing’ objectives. The proposed reduction in the quantum of homes provided for in the plan period is in fact greater than the reduction in the OAHN figure, but this again is does not indicate a ‘negative’.’ This in our opinion defies logic and has no regard to the severe and worsening housing needs of the area.

2.4 Given the above we do not consider the rational for the housing target to be realistic or justified. The evidence base, rather than support the figure adopted in the PSLP actually supports a higher figure. The PSLP cannot therefore be said
to be positively prepared, is not consistent with national policy, and is thus unsound. The overall OAN should be adjusted to circa 746dpa, and the plan should look to provide for an additional 50dpa (minimum) to meet Woking’s unmet needs.

3 The need for a stepped trajectory as proposed by policy S2.

3.1 Policy S2 suggests a stepped trajectory, with 450 dpa proposed in years 2019/20 and 2020/21, 500dpa proposed in years 2021/22 to 2024/2025, 600dpa proposed in year 2025/2026, 700dpa proposed in years 2026/2027 to 2028/2029, 800dpa proposed in year 2029/2030, 810dpa proposed in year 2030/2031 and 850dpa proposed in year 2031/32. In this regard we note that whilst paragraph 4.1.9a of the PSLP suggests that the stepped trajectory set out in the Annual Housing Target table adds up to a sum total of 12,426 homes, this is factually incorrect as it only equates to 9,818 homes. That said, if one includes 654dpa in years 2015/16 – 2018/19 the overall figure is 12,426 dwellings. We also note given the figures set out in the Annual Housing Target table that of the 12,426 dwellings proposed across the plan period, circa 50% are to be delivered in the last 8 years of the plan period (2026/27 (+)). In addition it is clear from the housing trajectory on p21 of the 2016 LAA that the stepped trajectory will result in housing delivery running below the housing requirement year on year until 2027/28 – some 13 years into the plan period – which does not suggest a plan that is positively prepared, effective, or consistent with national policy.

3.2 We also note that paragraphs 4.1.9a and 4.1.9b of the PSLP seek to justify the stepped trajectory on the basis that:-
- ‘This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period’; and that
- ‘This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy’

3.3 Whilst, given the clear and significant housing need in the borough a stepped trajectory seems irrational and contrary to the spatial vision of the PSLP, we note that the 2016 LAA suggests that some 9045 dwellings (net)[9] could be delivered in the first 10 years of the plan period, and a further 1,342 homes with planning permission are expected to deliver new homes in the next 5 years. Thus there is no reason why circa 10,387 dwellings could not be delivered by 2027/28. Indeed added to that which has already been delivered in 2015/16 and 2016/17 (668 dwellings), the plan should be looking to deliver 11,065 dwellings by 2027/28 not 6,926. Thus not only is the rational for the back loading of housing delivery unjustified, but the evidence from the 2016 LAA suggests that the area is in fact capable of delivering over 900 dpa (11065/12 = 922) and does not need to rely on a stepped trajectory that will in effect deliver just 62.5% of that which could be delivered.

[9] P17 2016 LAA

3.4 Whilst the 2017 LAA update provides no comparable assessment of predicted net completions despite the fact it looks to address the addition of new sites to the LAA and deletion of, or changes to, the housing capacity or phasing of existing sites; we note that the housing trajectory suggests cumulative completions of 13,581 which compares to a cumulative completion figure of 15,459 for the period 2015/16 to 2032/33 in the 2016 LAA i.e. is some 2,000 units less. It is however still some 1,000 units above the proposed housing target and given the fact certain assumptions made about former allocations will no doubt be the subject of debate at the EIP, demonstrates that GBC can clearly deliver more than they are looking to plan for – which does not demonstrate positive planning/ a plan that is justified and sound. Furthermore it appears that the level of housing proposed year on year in the PSLP 2017 encompasses a significantly greater gap to the housing requirement in the early part of the plan than that proposed in the PSLP 2016, despite the reduced housing requirement and extended plan period. This appears to be by and large as a result of the rejection of sites that had previously been allocated and again points to a plan that has not been positively prepared.

3.5 Given the above, and having regard to the scale of the housing need in the area, both market and affordable – as evidenced by the SHMA, the affordability ratio, the persistent history of under delivery and the current 5 year Housing Land supply situation (see below), there is no justifiable reason why GBC cannot allocate additional sites to help address its housing requirements/ look to liaise with those with extant consents to try and increase the density of development to improve delivery. The lack of any credible consideration of this approach to help balance the trajectory means the plan is not positively prepared or consistent with national government guidance.

4 The five year housing land supply

Section page number
Page 493 of 1722

Document page number
1194
4.1 The 2017 LAA and 2017 Housing Topic Paper (HTP) suggest a 5 year HLS of 2.36 year. The HTP also advises at paragraph 4.206 that: ‘Our five year supply as at April 2017 is set out below. This indicates a slight improvement since April 2016. This is primarily as a result of a slightly lower OAN and a reduced period of deficit.’ The 2016 figure was 2.1 years[10].

4.2 Paragraph 47 of the NPPF is clear that:
To boost significantly the supply of housing, local planning authorities should:

identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements.

4.3 Paragraph 033 Reference ID: 3-033-20150327 of the NPPG is also clear in that ‘The examination of Local Plans is intended to ensure that up-to-date housing requirements and the deliverability of sites to meet a 5 year supply will have been thoroughly considered and examined prior to adoption’

4.4 Paragraph 035 Reference ID: 3-035-20140306 of the NPPG also advises that LPA’s should ‘deal with undersupply within the first five years of the plan period where possible’

[Table]

4.5 Whilst we are not commenting upon the content of the HLS i.e. its deliverability, and the lack of any flexibility to take into account any non-delivery/ delay in delivery rates; the simple fact is the failure of the PSLP to be able to demonstrate a 5 year HLS and the continued shortfall against the housing requirement indicates a plan that is not positively prepared or consistent with National Policy. Whilst we appreciate the fact that GBC have excluded GB sites from the 5 year HLS calculation as they are not yet allocated, even using the trajectory at p8 of the 2017 LAA, the position would, against GBC’s own target be:

[Table]

4.6 Paragraph: 022 Reference ID: 3-022-20140306 of the NPPF advises that:
‘Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development.’

Paragraph: 026 Reference ID: 3-026-20140306 of the NPPF continues:
‘It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.’

4.7 Given the above, GBC need to undertake a further review of the LAA/ a further call for sites to identify sites that can be delivered earlier in the plan period. Whilst this may well mean reviewing the site constraints and looking at ways said constraints could be addressed/ looking to allocate a number of smaller sites that are able to deliver more quickly, this is a prerequisite of national guidance, and GBC cannot adopt an unjustified and negative approach to plan making. In this respect we note that The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply and we would support the Government’s proposal in the HWP in this regard.

4.8 As currently drafted we do not believe the PSLP has followed the advice in the NPPF, and that the LAA makes generalised and in some cases questionable assumptions about the connection between levels of housing provision, benefits and impacts. Furthermore it fails to consider the extent to which the issues identified might be resolved or mitigated through for example highways and footway improvements, sewerage infrastructure improvements, selective development of parts of sites, the incorporation of green buffers/ SANGS and other measures.

4.9 In the context of the above, as it is clear from the 2016 LAA that GBC have failed to meet the annual housing target of 322dpa established by the SEP for the past 7 years. The cumulative shortfall over the period 2008/9-2014/15 is circa 832 dwellings[11] (63% of the requirement). This is a significant shortfall and demonstrates why GBC should adopt a 20% buffer to address past undersupply. It also goes some way in explaining why there is such an acute housing need in the Borough now. This shortfall should be addressed, and the implications on the current 5 year HLS taken into account.
In this regard it is in our opinion imperative that any shortfall accrued in the early part of the plan is addressed as soon as possible thereafter – not pushed back to the end of the plan period via the use of the Sedgefield method of calculating the 5 year HLS situation. Pushing delivery to the latter part of the plan period will just mean that there is a higher risk of the plan failing to meet its housing requirement should any of the major sites being relied on not deliver to schedule. It also leaves less time for the Council to address such shortfalls in delivery through its contingency plans.

[11] P6 of the 2015/16 AMR indicates that 1,422 houses were delivered in the period 2008/9 – 2014/15. The requirement being 2254 (6 x 1322)

4.9 In addition to the above, we have to say that whilst GBC readily accept they do not have a 5 year HLS, there is nothing in the evidence base to suggest that they have discussed this with neighbouring authorities under the DTC or that they have looked to demonstrate how the matter was to be addressed if they are not able to deal with it themselves. The fact that GBC have failed to address this matter is such that the plan is unsound

8.1 We are disappointed to note the reduction in the overall housing target from the 693dpa proposed in the 2016 PSLP to 654dpa as proposed in the 2017 PSLP given the dire housing needs of the area. In addition we do not believe the level of housing growth proposed in policy S2 of the PSLP necessarily reflects the true OAHN of the area as the 2015 SHMA is based on out of date household projections, does not in our view look to address the issue of market signals and other indicators that point towards an imbalance between supply and demand, and no assessment has been undertaken of migration rates, the effects of London and the level of provision to address the unmet needs of adjacent authorities, esp. Woking. The 2017 addendum does not address this as it is not a true SHMA of the HMA – it merely assess housing need in Guildford without looking at the wider HMA. As such the OAHN has not in our opinion been justified and the resultant PSLP is not positively prepared or in accordance with the aims and objectives of National Policy, as required by Paragraph 182 of the NPPF.

8.2 We are also concerned that the plan does not take account of past under performance. This undersupply, which is in the region of 832 dwellings should be addressed in the housing strategy. If it is not the PSLP will not in our opinion be positively prepared.

8.3 We are concerned that the plan provides no flexibility – some flexibility needs to be incorporated into the plan to ensure it is effective and accords with the aims and objectives of national government guidance; and to ensure delivery. Furthermore we are concerned that despite what is said in the 5 year HLS statement of July 2016, the LPA do not have a 5 year HLS and that this matter has not been considered when addressing the DTC.

8.4 Given our position on the housing requirement and existing levels of supply/ the need to address past rates of undersupply, we believe additional land needs to be identified to meet this need. If additional sites are not allocated we believe the PSLP as drafted is unsound and should not proceed to examination as it is not positively prepared/ justified. It should be the subject of further evidence gathering and consultation on additional allocations before it proceeds to submission.

8.5 In addition to the above we do not believe the additions to policy A29 to be justified, or to accord with national government guidance in terms of the CiL regulations.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: JAA_reps_fro_A2__GBLP__Reg_19__July_2017__final__signed.pdf (502 KB)
I have written before with a lot to say in objection to previous local draft plans to build such an earth shatteringly MONSTROUS number of new homes ON GREENBELT LAND and basically want to emphasise AGAIN that if we go ahead and build all these new homes and new towns, like THREE FARMS MEADOWS, WISLEY AIRFIELD IN ADDITION to other parts of the borough down here - with all due respect my blood runs cold if I so much as take THE HOGSBACK ALONE for instance, and see what the plans are THERE, LET ALONE the local plan as a whole, bearing in mind what PRECIOUS LITTLE of greenbelt and proper countryside we have left for our lungs, our peace and sanity, our general health and longevity, healthy home grown produce, village character and community spirit NOT TO MENTION it's no small antidote to juvenile delinquency and obesity and good for the economy as far as education and tourism goes and if we ill-fulfil this local plan, I feel we will stand to ill-impact ALL the good things I've mentioned, or hinted at tied to our GOD GIVEN natural heritage that was put here LONG BEFORE we were thought of - FOR A REASON and as part of a divine plan in the beginning, our infrastructure will implode and all the things about this BEAUTIFUL county of ours that make it so attractive to move into will be gone and people won't WANT to move here anymore and won't be able to FLEE the place fast enough.

There are ways we can impress upon the government the need to tighten our borders and draw a line on birthrates and help restore a balance in this already imploding under the strain infrastructure of ours.

And last but not least the ALREADY MANIC South East is already MORE than developed enough not to need ANY MORE HOUSEBUILDING ESPECIALLY DOWN HERE and If we MUST build, there are more than enough brownfield sites and empty standing properties to MORE than accommodate for now at least but I can't emphasise enough the PRIORITY OF PRIORITIES to preserve what little is left of our countryside!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10746  Respondent: 9334785 / Carol Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is extremely doubtful that the proposal of 13,000 plus houses to be developed are reasonable and sustainable, particularly in view of Brexit. I therefore object to the Brough Wide Strategy (Policy S2). National Planning Policy promotes sustainable development, which this local plan lacks.

What is driving the need for housing in and around the villages of Guildford? I suspect it is the greed of our Borough Council to build more business premises and attract more people to live in the area, which is ludicrous as the road infrastructure is overloaded as it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10631  Respondent: 9335041 / David Reeve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Borough Wide Strategy

The Strategic Housing Market Assessment (SHMA) derived annual objectively assesses housing need (OAN) of 693, and the Local Plan calls for 13,860 homes to be built, which is the OAN multiplied by the 20-year term of the Plan (20 x 693 = 13,860). **OBJECT** to this level of planned housing on the following grounds:

- The Council has taken no steps to verify that the OAN is a valid estimate.
- Two recent reports (one by myself) have identified that derivation of the OAN in the SHMA was based on mutually inconsistent sources of data for the housing need arising from economic growth. Both reports also raised queries on the assumption that the ONS SNPP data for 2012 should be regarded as having a zero value for Unattributable Population Change.
- The assessed annual OAN has been superseded by the result of the EU referendum.
- The calculation of windfalls does not take proper account of the likely increase in ad hoc infill developments given the large scale insetting of villages from the Green Belt.
- The OAN has been carried forward directly into the Plan as the housing target, without applying the very real constraint of the Green Belt (which covers some 89% of the borough).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2628  Respondent: 9335041 / David Reeve  Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**OBJECT (on 4 distinct grounds)**

1. Paragraph 1 of the Policy states that the Local Plan will make provision for 12,426 homes over the period from 2015 to 2034. However the table of annual housing targets over the period 2019 to 2034 totals 9,810 homes, which is 2,616 fewer than the figure in paragraph 1. This difference implies that an average of 654 homes (2,616 / 4) were built in each year of the four years between 2015 to 2019 – which is almost certainly incorrect, as Guildford has never delivered completed homes at anything approaching this rate. I therefore object to this Policy on the grounds that the numbers don’t add up.

2. Additionally, and quite separately, the change in the planned number of homes from 13,860 (based on the West Surrey SHMA Final Report, September 2015) to 12,426 (based on the West Surrey SHMA Guildford Addendum Report, March 2017) is not supported by other credible and well-qualified assessments. In particular the reports produced by Neil McDonald Strategic Solutions (NMSS) in both 2016 and 2017 demonstrate that the SHMA assessments of the objectively assessed housing need (OAN) have been considerably over-stated, mainly because of:

   a) The particular circumstances of Guildford being a modest-sized town hosting a large university and other further education colleges with a correspondingly large population of students, and

   b) Errors in the assessment of the housing need arising from economic growth.

Planning Practice Guidance paragraph: 005 Reference ID: 2a-005-20140306 makes it clear that where appropriate Local Planning Authorities may depart from the standard methodology for deriving the OAN, and Guildford’s circumstances certainly justify that approach.
I therefore object to this Policy on the grounds that the OAN assessment is faulty.

1. Moreover, paragraph: 004 Reference ID: 2a-004-20140306 of the Guidance states that “The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.” Policy S2 is a specific policy of the Local Plan in which constraints have not been applied, and I therefore object to this Policy on those grounds.

2. Finally, I attach a copy of ministerial advice in three separate letters from Nick Boles MP, Parliamentary Under Secretary of State (Planning), which made it clear that “Student housing makes a significant contribution towards housing supply by taking pressure off demands on housing stock. This Government has clarified guidelines to make it clear that local authorities can include student housing in the calculation of, and the monitoring against, local housing needs regardless of whether they communal or sited on a university campus.” I have found nothing in the SHMA or the draft Local Plan that indicates that the proposed housing number was calculated after taking full account of the proposed scale of new student accommodation. Therefore I object to this Policy on the grounds that the final housing number has been calculated incorrectly.

ATTACHMENTS


1. D Reeve Letter 3 - Settlement Hierarchy (May 2014).docx

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Boles__Beresford_07022014_15052014__18062014_Redacted.pdf (6.1 MB)

D_Reeve_Letter_3__Settlement_Hierarchy_May_2014.docx (1.0 MB)
Housing Requirement

2.1 The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

2.2 The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

2.3 The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

2.4 It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

2.5 As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

2.6 The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

2.7 At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities. In particular Woking’s Core Strategy (2012) sets out its housing requirement as 292 dpa, some 225 dpa below the OAN as established in the 2015 West Surrey SHMA.

2.8 Notably this issue has been specifically considered by the Inspector at the recent Waverley Local Plan EIP hearing sessions. During these hearings, the Inspector clearly indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking. From our involvement in the Waverley Local Plan sessions it is expected that Waverley will be required to accommodate at least 50% of the unmet need from Woking, which amounts to 83dpa. Whilst recognising that the Guildford Local Plan would be examined separately and it would be for that Inspector to draw their own conclusions, the Inspector considering the Waverley Local Plan suggested that Guildford adopt a similar approach to take account of Woking’s unmet housing need. We would endorse the Inspector’s comments and recommend Guildford increase their housing requirement to include a proportion of Woking’s unmet needs.

2.9 If the reduced OAN for Guildford itself can be justified through the SHMA addendum (although as discussed we have concerns regarding the soundness of this approach) then consideration should have been given in any event to the ability of the Borough to meet the unmet needs of adjoining authorities, in particular Woking, before the Council decided to reduce its housing target. It is apparent that this approach has not been followed.

2.10 The importance of the duty to cooperate has been further reemphasised by the recent St Albans City and District Council decision ([2017] EWHC 1751 (Admin)). In reaching his judgment, the Judge highlighted that:
“Further, I accept the Secretary of State’s submission that once there is disagreement, I would add even fundamental disagreement, that is not an end of the duty to cooperate, especially in an area such as housing markets and housing need which involve as much art as science, and in which no two experts seem to agree. … the duty to cooperate is active, and on-going, and that to my mind means active and on-going even when discussions seem to have hit the buffers.”

2.11 Paragraph 4.1.9a of the Local Plan states:
“The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.12 Clearly therefore there is no justification to restrict the housing requirement on the basis of housing supply. As such it is considered the Plan should make provision for its full OAN and explore its ability to accommodate the needs of adjoining authorities. Additional allocations should be made to meet this requirement. At the current time the plan is considered to be unsound in that it is not justified, effective, positively prepared or consistent with national policy.

The phasing of development as set out in the Annual Housing Target table
2.13 We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

2.14 The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

2.15 The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2-236/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequently this raises concerns over whether any accrued shortfalls can be resolved.

2.16 If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

2.17 Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

2.18 The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in
housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

2.19 Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though if the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

2.20 We note that paragraph 4.1.9a of the Proposed Submission Local Plan states: “This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.21 We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6241</th>
<th>Respondent: 9607905 / Anne Pascoe</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. I OBJECT to the Borough Wide Strategy

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. Ashort, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West, but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the in-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's need. Guildford wants to build 7 sites of over
500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
In addition to this the allocation, of this site relies on unsound evidence base as we previously set out in our representations to the 2014 draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/10503  **Respondent:** 10299041 / F McHugh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
Enterprise M3 welcomes the overall vision set out in The Proposed Submission Local Plan and is committed to working with Guildford Borough Council and partners to achieve its vision during the plan period. Whilst our consultation response highlights key aspects that we feel require further consideration, we are on the whole content with the strategy set out within the document for delivering growth within Guildford up until 2033. Guildford Borough Council has worked closely with Enterprise M3 since the LEP’s inception in 2011 and is one of our key Growth Towns, as set out in our Strategic Economic Plan, 2014. Enterprise M3 wishes to continue to work collaboratively with partners at Guildford Borough Council as the Local Plan process continues and once adopted to facilitate its delivery.

New Homes
The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford’s draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015.

Whilst we are supportive of this policy, we note that the table showing Guildford’s Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.

Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town. Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period.

Enterprise M3 notes that within Guildford Borough Council’s Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply...
increases to 2.5 years, however the AMR recognises that this addition is not certain. Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford’s Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites. Housing affordability is a key issue across the Enterprise M3 LEP area, particularly in Guildford. The Proposed Submission Local Plan highlights that the affordability ratio in Guildford was 10.92 in 2013, higher than Surrey’s ratio of 10.89 and much greater than England’s ratio of 6.451. Guildford was also highlighted in Enterprise M3’s Housing Evidence Study, 2014 as the second most expensive district for people wishing to buy market housing. Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five or more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of paragraph 4.2.40 of the Plan which makes reference to the Council following a cascade mechanism to assist in the delivery of housing schemes should viability become an issue during the development process. Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference in section 4.2.12 to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2241  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

New Homes

The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford’s draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015.

Whilst we are supportive of this policy, we note that the table showing Guildford’s Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.

Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town. Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period.

Enterprise M3 notes that within Guildford Borough Council’s Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2015).
2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply increases to 2.5 years, however the AMR recognises that this addition is not certain.

Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford’s Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites.

Housing affordability is a key issue across the Enterprise M3 LEP area, particularly in Guildford. The Proposed Submission Local Plan highlights that the affordability ratio in Guildford was 10.92 in 2013, higher than Surrey’s ratio of 10.89 and much greater than England’s ratio of 6.451. Guildford was also highlighted in Enterprise M3’s Housing Evidence Study, 2014 as the second most expensive district for people wishing to buy market housing.

Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five of more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of paragraph 4.2.40 of the Plan which makes reference to the Council following a cascade mechanism to assist in the delivery of housing schemes should viability become an issue during the development process.

Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference in section 4.2.12 to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2242  Respondent: 10305921 / Enterprise M3 Local Enterprise Partnersh (Kathy Slack)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

New Homes

The Proposed Submission Local Plan provides for the delivery of 13,860 new homes between 2013 – 2033 in Policy S2, which equates to an average of 693 dwellings per annum during the Plan period. This is a welcome increase in housing provision since the previous consultation on Guildford’s draft Local Plan in 2014 and we note that this higher target is in line with the conclusions of the West Surrey Strategic Housing Market Assessment, 2015.

 Whilst we are supportive of this policy, we note that the table showing Guildford’s Annual Housing Target in Policy S2 and the housing numbers within this do not total up to the 13,860 dwellings to be provided for. We would recommend that for consistency with the principle of the policy that this be amended to reflect the total housing numbers to be provided for during the plan period.

Enterprise M3 is pleased to see that the Plan reflects the objectively assessed need across the Borough and that it is proposing a level of housing development which can support the continued economic growth of the town.
Enterprise M3 is therefore supportive of the increased housing target from 652 to 693 dwellings per annum during the Plan period. Enterprise M3 notes that within Guildford Borough Council’s Annual Monitoring Report (AMR), 2015 there is currently 2.4 years supply against an identified housing need of 693 homes per annum (taking into account completions since 2013, a buffer and accrued deficit). Taking into consideration pending planning applications in both Ash and Tongham supply increases to 2.5 years, however the AMR recognises that this addition is not certain.

Whilst Enterprise M3 is very supportive of the increased housing delivery target, we would like to emphasise the importance of accelerating housing delivery and ensuring that housing targets remain deliverable. This should be outlined within Guildford’s Housing Strategy for the duration of the Plan period (2013-2033). At the moment this Strategy only appears to cover the period 2015-2020. Enterprise M3 would welcome the opportunity to work with Guildford Borough Council to ensure that the increased housing target is deliverable. Enterprise M3 also notes the phased approach to housing delivery in Policy S2 but would encourage Guildford Borough Council to focus on early delivery in order to meet demand, particularly focusing on the large scale strategic housing sites.

[One or more sections of this comment have been removed because they did not relate to a change to the plan.]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15100  **Respondent:** 10326081 / Ian Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **Sound?** ( ), **Legally Compliant?** ( )

**OBJECT:** I object to the proposal to build 13,860 new homes:

This number is postulated in advance of the recent UK Referendum which now sets the course for a substantial revision of estimates for economic and population growth, including migration. A substantial downward revision will be necessary.

The number of 13,860 new homes remains unsubstantiated. The SHMA has not been scrutinised by Councillors despite repeated requests for debate, nor has there been any public consultation.

Other experts in this field of demography have not been able to reproduce this value or even close.

The Guildford Society concluded in 2014: "The premise for the housing data in the Draft SHMA published by GL Hearn looks deeply flawed and a full demographic analysis needs to be undertaken to understand the need for housing in Guildford during the Local Plan period."

The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need.

The notion that economic growth is somehow enhanced by building houses is flawed; there would be short a term boost and vast profits for the developers, their associates and banks, but the real outcome is to increase the level of personal debt, and with the house price/income ratio now approaching pre 2008 levels, in the South East, economic instability will result, particularly following an economic shock, such as interest rate rises or a recession.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the number of homes (14,000) that are been proposed, 690 per year till the end of the plan. This is unsustainable, the area will not cope with the additional infrastructure needed and increased traffic. It will encroach on to our greenbelt, a natural corridor for wildlife. Studies have already shown that the already existing traffic congestion cannot be solved so why on earth add more. Just think of the pollution that will affect the health of the local residents as stationary cars bellow out continuous fumes day after day. We need our greenbelt, Guildford needs it’s greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having read a leaflet from award winning property developers Dandara, I agree that the Council should consider smaller more proportionate development on lower quality Green Belt sites, rather than large-scale growth on some of the most sensitive Green Belt and countryside in the Borough.

For example their land adjacent to the A246, near West Horsley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18581  **Respondent:** 10448129 / Owen Jones  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**The Strategy**

The supporting text to the Local Plan’s spatial development strategy – set out in paragraphs 4.1.5 to 4.1.9 - rightly identifies the pre-eminent role of Guildford within the Borough and the wider sub-region.

Para 4.1.6 identifies that Guildford Town Centre and Urban Areas is the preferred focus for development in sustainable locations, ahead of inset villages and identified Green Belt villages. In the context that these locations cannot meet all of the Borough’s development needs, the strategy, summarised at Para 4.1.8, rightly affords a role to urban extensions to Guildford, along with Ash and Tongham.

However, this strategy is not expressed in any Policy. Policy S2 simply concerns the quantum of housing and employment land and traveller pitches that are to be provided during the plan period.

As such, the Local Plan does not give the strategic direction to new development in a fashion appropriate to its role as the Development Plan. This should be corrected.

The location of future development and the strategy has been guided to a large extent by the Green Belt Study, given its extensive influence within the Borough. The Green Belt Study (Pegasus, 2013) states that opportunities to accommodate appropriate development within the designated ‘Countryside beyond the Green Belt’ located outside of the Green Belt ought to be explored prior to those located within the Green Belt. This is not consistent with national planning policy. As an approach, it ignores the emphasis in the NPPF on sustainable patterns of development being achieved when Green Belt is being reviewed. Indeed, the correct interpretation and application of Green Belt policy in the NPPF is to consider this as a factor in determining whether exceptional circumstances exist to amend the Green Belt rather than affording a priority to non-Green Belt land in the first instance.

Given the relative sustainability and accessibility advantages of Guildford, in comparison with other locations, the strategy should ensure that development opportunities around Guildford are prioritised and optimised in advance of consideration of other locations, be they beyond the Green Belt or development at villages inset within the Green Belt.

In this regard opportunities to enlarge the strategic allocation at Gosden Hill Farm should therefore be considered.

**Housing Provision**

The housing requirement set by the consultation document is specified in Policy S2 and intends for 13,860 new homes to be built over the plan period (2013-2033). This is derived from the October 2015 Strategic Housing Market Assessment undertaken for the West Surrey Housing Market Area. It proposes a housing requirement of 693 dwellings per annum (or 13,860 over a 20 year period). As para 4.1 of the SHMA (Guildford Summary) states, this, in accordance with the
Planning Practice Guidance, take account of the level of housing provision which is expected to be needed to support economic growth and improve affordability. As a principle, this is to be welcomed.

We are aware that the DCLG published new household projections in July 2016, which are, by definition, more recent than those upon which the SHMA is based.

Nationally, over the period from 2012 to 2037, annual average household growth is projected to be 214,000 per year, higher than the 2012-based household projections figure of 210,000 per year for the same period.

For Guildford, the SHMA draws upon the 2012 based household projects, which suggested a demographic need for 517 dwellings per annum. In contrast the latest 2014 based household projection (live table 406) shows a household change averaging 600 per annum between 2013 and 2033. Prima facia, these latest household projections, which are to be the starting point in determining housing requirements, suggest that the housing requirement in the consultation document needs to be reviewed and potentially increased.

Turning to the housing supply, and in the context of the likelihood that the housing requirement will need to increase, the estimates of supply do not provide sufficient certainty that the housing requirement will be met.

The housing land supply strategy set out in Table 1 (when added to completions actual and estimated between 2013 and 2018 from the Housing Land Availability Assessment) does not provide the necessary flexibility to give surety that the overall strategic housing requirement of 13,800 additional dwellings over the plan period will be met.

With total supply estimated at 14,400 additional dwellings, this represents theoretical oversupply of less than 5% of the strategic requirement. It is important to recognise that not all sites will be developed as anticipated, not all planning permissions will be implemented, permissions may lapse or sites may be developed for alternative uses. The flexibility proposed is not considered to be adequate in the circumstances of this plan and the nature of the housing supply strategy. This is especially the case when the evidence suggests that the housing requirement may in fact be a minimum requirement.

Moreover, it is necessary for the Local Plan to be founded on satisfactorily achieving the ‘duty-to-co-operate’ requirement of the Act. In this instance, the inter-relationship with London is especially relevant, where is it already known that the City’s housing requirement is vastly greater than that which can be provided. The SHMA appears to set to one side the London Migration analysis, which would suggest an additional 568 households, in favour of the 2012 based household projections. Clearly, in the context of both the DTC and the most recent household projections this does not seem to be an appropriate assumption. This again implies a higher housing requirement will be likely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/895  Respondent: 10565569 / Sheila Mardle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I STRONGLY OBJECT to the disproportionate amount of development in one area of the borough yet again.

I OBJECT TO THE LIMITED CONSULTATION PERIOD.

I OBJECT TO LAST MINUTE INCLUSION OF NEW SITES.LESS THAN 2 WEEKS NOTICE!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/898  **Respondent:** 10565569 / Sheila Mardle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THIS ILL THOUGHT OUT PLAN FOR OUR AREA OF GUILDFORD BOROUGH.

I WISH MY OBJECTIONS TO BE ADDED TO THE MANY OTHERS OF CONCERNED RESIDENTS IN GUILDFORD AND ESPECIALLY IN SEND AND SURROUNDING VILLAGES AS WE ARE ONCE AGAIN PARTICULARLY AFFECTED BY THESE DRAFT PLAN PROPOSALS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6538  **Respondent:** 10568769 / Steve Trowbridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

[My particular concern relates to the excessive level of development proposed for East and West Horsley, collectively referred to as the “Horsleys” ...]

Whilst an argument could be made that some people will walk or cycle to the station following such a development, as a cyclist, it is already noticeable how poorly maintained the roads and pavements are in the Borough – the road in front of the Horsley shops and up to the station is a perfectly appropriate example of a dangerously potholed stretch of tarmac – cycling is therefore an unsafe option, especially when coupled with the poor local drainage and local flooding. Whilst an attempt has been made in some places in the Borough at marking out cycling lanes (A246, Ripley etc), it appears that the Council feels that painting a white line is “job done”. No effort is then made to repair holes in those lanes, to clear rubbish (metal, glass), to remove overhanging vegetation or to fix collapsed manhole/inspection chamber covers. Likewise pavements, especially in Horsley, are either too narrow (pedestrians at risk from being struck by vehicles/wing mirrors/flying stones), unpassable in wet weather (due to cars swamping the pavements with water) or are poorly maintained. Existing policy therefore seems orientated towards cars and, as mentioned earlier, the infrastructure will not be able to cope with this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/949  **Respondent:** 10569953 / Darius Hughes  **Agent:**
Policy S2: Borough wide strategy

I totally oppose the calculation that 13,800 new homes will be needed in the borough over the planning period the number is far to high and unsustainable in the villages and countryside.

I would ask the council to reconsider the local plan reducing the number of homes, keeping the current boundaries of the greenbelt and where building is needed providing adequate infrastructure and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs
2. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads, including the A247 which are all already at 100% capacity.

GBC has completely failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and Green Belt. GBC have also failed to include the Town Centre Masterplan 2015 within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I write as Liberal Democrat Parliamentary Spokesperson for the five Guildford Borough wards in Mole Valley Constituency – and a resident of nearby Bookham - to express my strong support for the many hundreds of objections you have received to the Council’s latest draft local plan from the East of the Borough. I urge you to reflect carefully on both the volume and the compelling quality of those objections, especially those from local parish councils, residents’ associations and other responsible individuals and groups.

In my view there is no justification for the disproportionate housing burden being proposed for this part of the Borough; the disregard for the lack of infrastructure, the impact on already congested local roads and the carefully considered neighbourhood plans that have been or are being developed by local residents; the proposed removal of so many rural villages from the Green Belt; or the repeated insistence on retaining rejected development sites such as the former Wisley Airfield.

It is disappointing that the divided and dysfunctional Conservative group which controls Guildford Borough Council and their local MPs still appear to be incapable of working with Government and local residents, businesses and other organisations to produce and agree a sensible, balanced, proportionate and sustainable local plan for the Borough. Please try harder.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Borough over this same period. It is clear that GBC is promoting an economic expansion which appears to underpin the housing policies in the Local Plan.

I OBJECT to Policy S2 as I do not think any economic growth promotion should be used in the projections for housing growth especially in the light of the recent outcome of the Referendum on the EU membership.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am opposed to the Guildford Borough Proposed Submission Local Plan: Strategies and Sites 2016 (The Plan) in its current form because it:

- has a disproportionate impact on the villages,
- does not respect the character and density of the housing in the area,
- does not guarantee the creation of supporting infrastructure,

while encroaching the Surrey Hills Green Belt which is a national rather than a purely local asset.

The disproportionate impact on the villages seems ludicrous. An 11% increase in housing in Guildford, versus a 35% increase in West Horsley. An increase in the population in large towns will have a lesser impact on the character of the area and the density of the housing, as well as having an advantage of having a better foundation of infrastructure. The reason for everyone I know to move to the villages, was the appeal of a ‘village’ life. Making them into suburbs and towns, destroys the character and eliminates that appeal. A simple look at the Horsley Development Sites map shows the magnitude of impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

2. To allow the proposed number of dwellings, 14,000, within the villages of Ripley, Send, Clandon and Ockham is a frightening prospect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount of development in one area of the borough - why on earth would this be sensible (in terms of infrastructure and irreparable destruction) or fair? If destruction were needed (and I am not convinced it is) please share this out rather than spoiling one area. Also why on earth would you not, for example, seek to build on the edges of existing built up areas like Woking (where development would be extension rather than change) rather than changing the face of rural areas such as Ripley and the Horsleys forever?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

My husband and I strongly object to the 2016 Draft Local plan, particularly all erosion of the green belt.

In the plan to build 14,000 new homes many of our local villages are to be removed from the Green Belt which will allow unlimited future development and the destruction of our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsley's (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The
Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6681  Respondent: 10621825 / Dorothy Wilkie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan on the following points.

1. Increased volume of traffic
2. Loss of green belt
3. High level of development in on area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17323  Respondent: 10627457 / Graeme Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that this inflated final target housing number results in:-

- up to a 35% increase in the number of households in West Horsley.
- up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield

The infrastructure of the Horsleys as outlined above cannot support this expansion.

In addition, 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1309  Respondent: 10627457 / Graeme Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1) Policy S2 Borough Wide Strategy
   a) The conclusions of the revised SHMA are seriously flawed for various reasons, inter alia:- *the GL Hearn report suggests a requirement for some 654 houses per annum. This is an increase of 22% of the current housing stock for a projected population increase of just 10.4%
   b) GBC fails to make any allowance for planning constraints, particularly the Green Belt. The already overstretched infrastructure is not addressed. GBC Proposes to remove large swathes of the Green Belt, without demonstrating the required 'very special circumstances' to justify such action. GBC Is ignoring the many thousands of objections to this part of the proposed plan.

I STRONGLY OBJECT TO THE BOROUGH HOUSING TARGETS SET OUT IN POLICY S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11124  Respondent: 10633761 / Guida Esteves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Borough Proposed Submission Local Plan (June 2016)
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).
The consultation has been done under Regulation 19. There are substantial changes to the Regulation 18 consultation held in 2014 and thus a consultation limited to 6 weeks is insufficient to allow full understanding of the Proposed Submission and its evidence base. The evidence base presented has 28 documents, 14 of which have been updated since the previous consultation, which no indication provided of what has changed. The Proposed Submission without appendices is 255 pages and the evidence base (excluding other documents) is over 2500 pages. A significant amount of detail to be assimilate in 6 weeks. The Proposed Submission and its evidence base has changed too much, without any details of those changes, to fir into a regulation 19 consultation.
The reasons I object are:
1. I object to the proposed overdevelopment of Send and that Policies S1 and S2 are not sustainable
   The GBC proposal for 10395 new houses for the 15 years from 2018 to 2033 (13,860 from 2013 to 2033) is not sustainable. The outcome of the Regulation 18 consultation was the delay of the GBC Local Plan where the then GBC leader, stated that the council had taken on board the concerns of residents and the revised plan would, with support from central government, apply infrastructure and Greenbelt constraints. There is no evidence of this in the Regulation 19 Proposed submission which has not only increased the average annual housing numbers; it has increased the housing allocation for Send (which includes the settlements of Send, Send Marsh and Burnt Common) from 431 to 485. This overdevelopment of Send will damage the communities and I am concerned that an infrastructure need 4km away (i.e. a new A3 junction to enable the Wisley Airfield site) is having a disproportionate impact on Send, Ripley and Clandon. At a public meeting in Send on the 14th June, the GBC leads for planning and infrastructure confirmed that the 400 houses planned for Site A43 (Garlick’s Arch) are the price the landowner is being “paid” for gifting the land for the new A3 junction at the same site, called A43a. The price will actually be paid by the residents of Send, Ripley and Clandon, and this is not acceptable.
   Not only is this housing development inappropriate for the community, it also adds 7000sqm industrial development. This is in addition existing brownfield industrial site located at Burnt Common. This is an over-development of dwellings and employment space for such a small community.
   The evidence quotes the 400 homes as “additional homes that can be provided in the early years of the Local Plan” (Guildford Borough Flood Risk Sequential and Exception Test May 2016). Therefore in addition to allocating 400 houses in Send to satisfy an infrastructure requirement 4km away, the proposal is to also bring these forward to the early years of the plan to satisfy housing targets for the rest of the borough.
   The Plan is unbalanced across the borough; 42% of all the housing proposed from 2018 to 2033 is in Send (A44/A42/ A43/A43a), adjacent in Send (A25), or in Ripley (A35).
This proposed over-development of Send is in contradiction of the "The Rural Land Assessment" provided as evidence, which states that the GBC should:

? “Retain the distinct separate settlements of Send, Send Marsh and Ripley and avoid merging these through linear development along rural roads. Retain gaps such as along the B368 between Send and Send Marsh or between Ripley and Send Marsh along the B2215.” (page numbered 117)

? “Conserve the rural roads minimising small-scale incremental change such as signage, fencing or improvements to the road network or bridge, which would change their rural character particularly to the north and west of the area.” (page numbered 117)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16103  Respondent: 10638209 / Wendy Rockhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, the north east has taken an unsustainable number, in an area where country lanes are narrow, street lighting and pavements are limited or nonexistent. The current high density of traffic now using through routes results in them being “gridlocked” at peak times. There has also been an assumption for which there is no evidence that there will be more cyclists. The area has no cycle paths. Public transport across the area is poor and is currently being reduced which in itself will result in putting more cars on the roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/289  Respondent: 10638241 / Irene M Bleach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH

I OBJECT TO THE LIMITED CONSULTATION PERIOD

I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN TWO WEEKS NOTICE

I OBJECT TO THE LACK OF ANY EVIDENCE FOR THE ELL EGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| On some of your specific policies, I wish to register my OBJECTIONS to the following: |
| POLICY S2: As I said already, the housing numbers are much too high. Also, following BREXIT, the numbers of immigrants coming into UK will go down for sure, so even the 15% projected rise is now looking too high. Also, GBC’s economic forecasts, which you use to justify all this extra housing, all of this will need to come down too. I think you really need to re-work all of your figures here. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| Comment ID: pslp171/436  Respondent: 10641953 / Wiesia Taylor  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| The level of new housing proposed in the Local Plan is still much too high. A proposed increase in the housing stock of the borough of 22% is far too high a target to set. With Brexit almost certain to lead to lower levels of population growth, this very high level of new housing development is unnecessary and will create all sorts of problems in the borough where infrastructure is already over-stretched and where our green areas are becoming increasingly spoiled. For this reason I strongly object to the revised policy S2. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| Comment ID: PSLPP16/16096  Respondent: 10643073 / C Prowse  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| The local plan allocates a large percentage (over 20% ) of new housing in the local plan to the villages of Ripley, Send, Ockham and the Horsleys). This seems to be a very biased distribution and heavy penalty for these small villages to bear. Surely if more housing is needed then it should be allocated evenly across the Borough and we see no evidence that this is the case. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
| Comment ID: PSLPP16/5895  Respondent: 10643457 / Burpham Neighbourhood Forum (Catherine Hughes)  Agent: |
### Housing Numbers

There is no sound justification for the increased estimate of housing numbers from the last draft plan in 2015.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1320  **Respondent:** 10646753 / Jenny Mackenzie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate amount of development in one area of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/11066  **Respondent:** 10647169 / Richard Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The proposed building of 593 new houses is out of all proportion to the villages current size; it is understood that there is need for housing, but where did these numbers come from, based on what criteria?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17018  **Respondent:** 10653537 / Mike Elrick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
6 Alternative suggestion for allocating housing in a Local Plan

Setting aside all planning designations (including AONB, Green Belt etc), every community in the country from the smallest hamlet to the largest city should designate area(s) of land to accommodate “x %” of the number of existing dwellings. That percentage could vary every 5 years and calculated centrally to satisfy the nation’s housing shortfall.

If “brownfield land is available - then it should be used. Otherwise those people currently blessed with pleasant protected countryside should bear the same burden as any urban residents.

Nimbyism defeated at a stroke !!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

1. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.[2] The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,[3] leading to reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

1. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted.[4] But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

[1] At the time of writing, about £8billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.
This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

See http://www.glhearn.com/developer/Pages/Overview.aspx: “We act for many of the leading developers.” G L Hearn is now part of Capita Real Estate.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6025  Respondent: 10663585 / Nigel Killick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlicks Arch, West Horsley and the hogs back. All are out of proportion to the surrounding areas. None qualify for the exceptional circumstances required to take them out of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16833  Respondent: 10663585 / Nigel Killick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the scale of new building throughout the borough, this is disproportionate and unjustified.

I object to all strategic sites in the local plan, Blackwell Farm, 3 Farms Meadows, Garlicks Arch, West Horsley and the hogs back. All are out of proportion to the surrounding areas. None qualify for the exceptional circumstances required to take them out of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4525  Respondent: 10667073 / Trudi Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley HMA should be an area within

which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury,

Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I totally get that Surrey is the 2nd wealthiest County after London and that the Council are hellbent on making Surrey an economic epicentre of growth and development.

As a SME owner in my mid 40s I am grateful of the opportunities that are available to me and my family living in West Clandon and working in East Horsley.

I do feel that there should be some appropriate, sensitive, practical and well thought out development in the Borough of Guildford. However I am strongly opposed to the approach taken by removing the green belt and building some spurious number of houses without much consideration of the ramifications to the people who have chosen to live here and paid a premium to do so.

I strongly believe that greater effort and vision should be applied to finding sites that might suit a more exciting form of development, flats don't always need to be 1 bed, they could be 3 bed family units!

The other issue is the impact that more development will have on an already creaking infrastructure. I appreciate that infrastructure can only be afforded on the back of development but why not design the infrastructure first and then go to developers to see could facilitate it.

I do not envy you but greater vision is needed to resolve the issue of the economic growth in the South East.

Good luck

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area {HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents
work elsewhere, and half who work here live outside the borough. A short, half hour commute puts the
borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to
the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from
Guildford town centre, is outside the HMA. It is no justification to say that the tri borough area has been used
in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury,
Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no
public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready
alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing
numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are
being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to
build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units,
compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east
of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43)
and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of
all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these
three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.
Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result
in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does
not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each
of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I further object to the proposed development sites at Wisley Airfield and Garlicks Arch both of which represent significant overdevelopment of Green Belt sites, disregard the availability of brown field sites and singularly fail to take account of the effect on transport infrastructure which is unsustainable.

The scheduled proposals for the Wisley site will place a wholly unacceptable weight of traffic on already congested roads in village centres and trunk road connections. Any resident who has to access the northbound A3 at peak times from Ripley or Ockham is painfully aware that the junction can barely cope at present.

The proposed size of the Wisley Development will give rise to unacceptable log-jams making viable commuting impossible.

There are no viable train connection to serve these sites and the area is already very poorly served by bus services. All transport requirements will therefore inevitably fall on the already overstretched roads. The effect of these developments on the Portsmouth Road running through Ripley and Send, which already carries a staggering volume of traffic, will be to return the road to levels of congestion which existed before the A3 Trunk Road was built.

The proposed A3 north/south junction at Burnt Common does nothing to alleviate the congestion and will simply lead to congestion where A3 traffic meets traffic on the already congested local roads. There will therefore be traffic “black spots” both to the north and south of Ripley.

I further object to the imbalance of proposed development sites which are located in the North East of the Borough. Housing needs within the Borough arise in all areas yet there are no proposals for sites to the south and west of Guildford.

Large developments of the types proposed in Wisley and Garlicks Arch are simply unsustainable. Significantly smaller developments linked to existing village envelopes, will not place stress on transport infrastructure and the amenity of the rural environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/13439  **Respondent:** 10701537 / Ben Gamble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to the Borough Wide Strategy (Policy S2)

   The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not applying any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs to all the other Borough Councils in Surrey.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough. They are very much rural Wards and this will change for ever under the Plan.
Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result
coalessence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not
reflect the current distribution of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

In the last five years planning consent has been grant for approximately 115 new houses in the Lovelace Ward. This
alone has dramatically impacted on the character and the communities in the Ward. Over 2,400 houses are proposed in
the Ward over the period of the Plan. These houses will more than double the number of houses in the Ward and will
totally change it, without any consideration of what the Ward actually needs.

A neighbourhood plan is currently being drafted for the Lovelace Neighbourhood Area, which follows the boundaries of
the Lovelace Ward. The Plan should be redrafted once the neighbourhood plan has been prepared to reflect the local
needs.

Fundamentally, the developments proposed in the Plan do not meet the needs of the local communities and the approach
adopted in the Borough Wide Strategy is wrong.

In view of the comments above it would appear logical to apply constraints in line with government policy to the
development being proposed to take account of the fact that 89% of the borough is in the permanent Green Belt and
development is not supported by adequate major infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

2. I object to the Borough Wide Strategy

The plan will cause obliteration and devastation of the beautiful countryside between the villages and cause them to
coalesce into an urban sprawl. The 13,860 houses are disproportionately allocated to development in the north east of the
borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden
Hill (Clandon) (A25) as major residential sites. These precious English villages will be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I had a very interesting piece of paper through my letterbox from dandara regarding where new development takes place. According to them they already have land next to the A246, which whilst green belt, is surrounded by urban influences including existing housing and the main road to Guildford from the east. It would be a sensible and proportionate addition to the village.

Why hasn't SCC or GBC considered this? Surely it would be much better for everyone concerned to have small and medium scale sites, in order to provide the Council with an opportunity to deliver a more equitable spread of development across the Borough?

This would limit the loss of the most important green belt land. More research needs to be done to bring to the fore, the lower quality green belt land and countryside that should be identified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1493 Respondent: 10717985 / Alison Drennan Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object - In the 2014 Local Plan GBC itself recognised that the legitimacy of the data they cited to build excessively numbers of houses was miscalculated and reviewed by its own Scrutiny Committee who decided the number should be reduced. Post-Brexit all projections for population growth economic growth and migration need to be reviewed, as a matter of urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4362 Respondent: 10717985 / Alison Drennan Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• I object to GBC failing in it’s duty to respond adequately to residents concern about the above, and failing in its duty of care under the Human Rights Act.
• I object to GBC proposing excessive development will result in a decrease in air quality and directly impact on the health and wellbeing of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/647 Respondent: 10717985 / Alison Drennan Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
I object to the proposed number of traveller, travelling show people plots included in the plan, it is inconsistent, for example A50 Whittles Drive, Normandy, *The site is allocated for approximately 14 Travelling Showpeople plots ...* Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE

---

Comment ID: PSLPP16/13880  Respondent: 10718113 / Peter Homonko  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Farm Land.

Speaking of Brexit, isn’t it likely that we may need all of our farm land to provide for our future agricultural needs? Building on farm land seems to me to be a very short sighted idea.

Finally

I should add that I am not against any development of new housing at all. Clearly we do need to increase the housing stock. However, I believe that the focus at this time should be on smaller scaler development on brownfield sites, with only modest and environmentally sympathetic expansion in to (non green belt) green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5176  Respondent: 10720833 / S Bryon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE 2016 DRAFT LOCAL PLAN
I OBJECT TO THE DISPROPORTIONATE DEVELOPMENT IN ONE AREA
I OBJECT TO THE LIMITED CONSULTATION PERIOD
I OBJECT TO INCLUSION OF NEW SITES WITH UNDER 2 WEEKS NOTICE
I OBJECT TO PRIORITISING GREEN BELT DEVELOPMENT OVER BROWNFIELD WHICH COULD SUPPORT
50% BUILDING

I OBJECT TO INCORRECT HANDLING OF DEVELOPMENT THROUGH REGULATION 19 INSTEAD OF
REGULATION 18

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7812  Respondent: 10721537 / Stephen Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the complete failure/lack of will/enthusiasm of GBC to identify sufficient brownfield sites within the urban
area which should be identified/targeted first for any development. The open countryside and the Green Belt should be
looked at after the availability of brownfield sites have been exhausted. I object to the failure to include the Town
Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17906  Respondent: 10722049 / Richard Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2) on the grounds that the proposed developments appear to
be designed solely to meet the needs of Guildford Town rather than the needs, wishes or requirement for a
peaceful life for those residents in the surrounding villages and local communities.

The Local Plan proposes 13,860 housing being developed across the borough, of which only 1,135 homes are designated
for Guildford Town of the 12,578 homes listed on pages 123 to 126 of the Local Plan. In fact, of the total new homes
proposed by the Local Plan, 3,800 are to be built on farmland outside the existing urban development and a further 5,670
are to be built on the Green Belt itself or in villages and communities surrounded by the Green Belt.

This belies the suggestion that these houses are being built to provide homes for those working in Guildford itself and
suggests that many of these homes are being built for people who simply wish to relocate to this area or possibly for other
immigrants to this borough.

In 2.3 of the Key facts about the borough, it states that “the population has risen steadily from 93,000 in 1951 to 137,183
in 2011. The population is predicted to reach 162,188 by 2033”. This figure is based on information provided by The
Office for National Statistics (ONS) in 2016. However, these numbers are based on pre-Brexit data for economic and
population growth, including migration. At the very least, these figures now need to be considered in light of the
changed circumstances and should be revised downwards, possibly quite significantly.
As identified in Policy H1 at 4.2.3, “we have an ageing population with a significant projected growth in the over 65 year olds”. It appears unlikely that these individuals will reproduce at this stage and, as the effect of the post-war baby boom runs its course, this population is likely to diminish rather than increase.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half of those who do work here live outside the borough.

A short, half-hour commute puts the borough well within the reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West, but all lie well outside “West Surrey”. Each of these towns is well placed to provide labour in order to meet any real increase in demand for labour in Guildford Town by use of the existing rail infrastructure without destroying the Green Belt or adding to the traffic problems and local pollution.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough through the choice of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

In summary, the borough wide strategy is poorly considered and appears to have been based either substantively or at least in part on a report prepared for the Council by Surrey Community Action, a charity that appears to be heavily conflicted in preparing a reasoned assessment of the actual needs and requirements of the borough as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having reviewed the Local Plan we wish to express our concern that the Council has ignored objections we and other residents made in the 2014 consultation. This shows a complete lack of consideration for the impact of such extensive development in the local area.

I object to the local plan as a whole, as the Borough has failed to provide sound evidence of the needs for much of the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4955  Respondent: 10723073 / M. Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Developers should be using the many brown-field sites identified in the Borough before any other sites are even considered.

We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.

I believe the Local Plan 2014 is flawed; lacks adequate research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using inappropriate legislation. It must be properly reviewed and consulted under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11717  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2). There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16814  Respondent: 10723553 / Judith Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the disproportionate amount of development in one area of the Borough – such a drastic increase in housing numbers will have significant effects on noise, traffic and pollution in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6969  Respondent: 10724769 / P. Broughton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send, Ripley, Send Marsh, Clandon and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. None of these areas have a decent bus service and therefore new homes will rely upon cars for transport adding to existing congestion.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8613  Respondent: 10725345 / T. Sharman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the lack of thought and consideration to the local needs such as the over development of housing and industrial use which is far and above what is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4843  Respondent: 10725537 / D. Warriner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the amount of development in one area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11882</th>
<th>Respondent: 10727457 / Colin Eke</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10686</th>
<th>Respondent: 10727489 / Gaynor Eke</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10687</th>
<th>Respondent: 10727489 / Gaynor Eke</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Object to the impact on the greenbelt status of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7463  Respondent: 10728481 / Patricia Ray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5 I OBJECT to the limited consultation period given.

1. I OBJECT to the last minute inclusion of new sites with insufficient notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6387  Respondent: 10728993 / Gill Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I OBJECT to the disproportionate distribution of houses across Guildford Borough, by far the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I OBJECT to the methodology of drawing-up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I OBJECT to the 2016 Draft Local Plan as it has had no regard to the number of schools required or additional health centre or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6560</th>
<th>Respondent: 10729281 / Richard Croxford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object</strong> to the manner in which the latest proposals are significantly different from the previous local plan in 2014. Calculations and assessments (for housing needs) have been re-evaluated and I believe that they are not accurate or truly reflective of the needs of the local area. Recent proposals for local housing have been assessed at wildly differing levels in the last two years, and so one has to question the methodology used.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object</strong> to the lack of consideration given to 'brownfield' sites. It seems clear that there are sufficient 'brownfield' sites available and therefore there is no need to access or use any Green Belt land. I believe that the overall intention of the proposals is to 'inset' the villages from the Green Belt, paving the way for future re-development that simply is not needed at the levels suggested.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/446</th>
<th>Respondent: 10729473 / P.T. Elms</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object</strong> to what appears to be the strong reluctance of GBC to build on brownfield sites (50% of new homes needed could be built on brownfield sites).</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/448</th>
<th>Respondent: 10729473 / P.T. Elms</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object</strong> to the dangerously high levels of pollution which will be the result of the plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2569</th>
<th>Respondent: 10731233 / Linda Aris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8722  Respondent: 10731265 / Liz Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please note that I object to:

The number of homes that the Plan expects to deliver.

This target of 693 is much higher than the Council proposed last year and disregards the fact that the borough has such a high proportion of its area designated as Green Belt land. The roads, schools, doctors and hospitals etc. can’t support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13165  Respondent: 10731937 / Carol Mullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12881  Respondent: 10731969 / Tony Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2650  Respondent: 10732161 / Anne Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the local plan as the development proposed is not sustainable.

I object to any tinkering with the Green Belt as it was intended to be permanent and an essential protection against over-development in rural areas.

I object to the local plan as all the emphasis is placed on removing land from the green belt and then building on it.

I object to the fact that most of a very attractive rural area in the green belt will be smothered in housing from Guildford to Cobham. I object to the failure to find and allocate brown field sites for development rather than Green Belt land.

I strongly object to GBC's proposal for 13,860 new houses without any evidence that anything remotely like this number is needed. It is disproportionate to place 38% of extra houses in the area north east of Surrey. 5,036 houses between Burpham and the M25 is totally unjustified and will change the nature of the area leading to the merging urbanisation of these villages. 693 houses a year is way beyond what is needed and is more than double even than GBC's previous assessment.

I object to the proposals in the Plan being based on figures of demand, the details for which have not been disclosed. This is not justice and would not be admitted in a court of law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8233  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the complete failure of Guildford Borough Council to identify brown field sites S2, within the urban area. Why build so much on the Green Belt when there is the possibility of brownfield development in more urban areas?

Although I am totally unacquainted with David Roberts of West Horsley, I have seen a copy of his 13-page letter of objection which raises very serious matters, not least about the way the Plan appears to favour profit-making developers with no local interest rather than local residents and conservation of the character of the area. This I object to most strongly.

I object very much to the exaggerated proposal to build nearly 14,000 new homes in the Guildford area and over 5,000 between the M25 and Burpham, and in particular the reported refusal to produce evidence of how the purported need for these numbers is arrived at. It is no use saying that the firm which came up with the figures refuses to explain the figures because it would infringe their intellectual property rights. In the absence of explanation this should be refused as evidence. It is well-known in legal circles that where mystery begins Justice ends. The suspicion is that, for whatever reason, the needs of development companies have been given priority over the wishes of the local population.

The numbers proposed, or anything like that amount, are totally unsustainable, especially for Send, Ripley and Ockham where there are no railways, and the bus services would be inadequate. Almost every household would have two cars which would make a bad situation on the roads much worse. The plan is in any event unbalanced across the Borough in that 36% of the plan's housing is proposed for the north-east of the borough which has only 11% of the existing housing. Such an unbalanced situation is grossly out of proportion. The rural roads in this area are narrow, poorly maintained and most have no footpaths and are dangerously unsuitable for the likely traffic from 5000 more houses. Development should be in urban areas where there is sustainable transport. What are the Guildford Councillors thinking of in advocating the delightful area north east of Guildford being turned into a sprawling concrete jungle? They certainly have no mandate for that, as was clearly shown by residents' objections to the first edition of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8242  Respondent: 10732193 / Leslie Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the unbalanced nature of the Plan in singling out so much of the Green Belt area north west of Guildford for the unnecessary development rather than spreading it more evenly around the Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9633  Respondent: 10733121 / F. Buchhaus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GBC circumventing proper protocol under Regulation 18 by using a shortcut without proper consultation

I object:- to GBC failure to consider a wider and thinner spread of housing over a greater number of villages

I object:- to GBC not considering development options less damaging to our way of life

I object:- to GBC not reevaluating future housing demand in light of Brexit

I object:- to GBCs attempts to avoid proper consultation of all parties concerned as laid down by statute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3670  Respondent: 10733665 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Guildford Borough Council not identifying sufficient brownfield sites, nor including the Town Centre Masterplan in the overall Local Plan and thereby eliminating or reducing the development needs outside current urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14780  Respondent: 10735777 / S. May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-
The borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clordon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clordon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/4173  **Respondent:** 10742945 / Trevor Brider  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

More homes must be built on Brownfield sites first, and I feel that Surrey University should build the promised student accommodation at Manor Farm to house more students on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/7682  **Respondent:** 10749409 / B. Holmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. The high number of proposed homes is too high to be sustained in local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/1009  **Respondent:** 10756033 / John Herbert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

- Traveller site allocation is inappropriate and in conflict with the Department for Communities and Local Government Policy E16: Traveller sites in GreenBelt:

  Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

  We are overpopulated in this part of the country. In satiable demands for new housing conflicts directly with our inadequate infrastructure. One solution would be to reverse the trend by encouraging businesses to relocate to under populated parts of the country or regeneration areas. If we don't then our quality of life and crime rates will surely degenerate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In the main, the revised plan continues to erode the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific objections to the 2017 Plan are:

1. I object to Policy S2 for the provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. The figure is too high as shown by the independent report commissioned for the GRA.

2. I object to the population growth figures in section 2.3, which have actually increased by 5000 over the previous plan. Downward economic pressures have not been taken into account in this new assessment.

3. I object to the fact that Policy S2 appears to include demand from London and nearby Woking in its assessment – Guildford should not become a dormitory town for either area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the concentration of development in the North of the Borough, aimed at appeasing developers, maximising their profits and benefitting an overspill population from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/593  Respondent: 10756961 / Carol Marsh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15684  Respondent: 10757185 / Liz George  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proper use of Brownfield sites ie Slyfield mean that this green belt area is not needed

A smaller plan for under 50 properties in total should be considered with other villages throughout the Borough accepting similar proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4963  Respondent: 10758593 / Richard & Delia Baker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **OBJECT** to the Borough Wide Strategy

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour, commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre; is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12189</th>
<th>Respondent:</th>
<th>10765249 / Andy &amp; Sonja Freebody</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s ‘need’. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This is a mere numbers game to the LA – In my opinion, without proper review as to the regeneration of potential brownfield sites in and around more established parts of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11756  Respondent: 10768417 / James Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5). I object to the Borough Wide Strategy (Policy S2).

The proposal by Guildford Borough Council for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The proposals are for too much development in the north east of the borough (Wisley, Ripley & Send). I understand 36% of all the Plans new housing is proposed in this area, which has only 11% of the existing housing.

Ultimately all this new housing will merge Wisley, Ripley, Send, Clandon all together and they will cease to be villages and become one large urbanisation!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12582  Respondent: 10769121 / Ali Elson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside
“West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these
constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/200  Respondent: 10773377 / Margaret & Morten Frisch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have read and considered Guildford Borough Council’s latest Proposed Submission Local Plan and I object to this in the strongest possible way for the reasons stated below:

1. The additional housing units proposed is far too high when compared to the official population forecast for the area. It should be scaled back to reflect the official forecast.
2. Surrey University should build housing units on its car parks allowing housing units in Guilford to be released from student use to use by the general population as low cost housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13593  Respondent: 10773441 / Barry Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been
scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I
have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website
openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the
plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical
because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only
deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial
statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the
rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because
developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining
profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning
permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else
can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a
baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of
Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by
SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale
of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand,
would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection
to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or
increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of
London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green
Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these
constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The
Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density
of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable
development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.
The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built
up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of
the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden
Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/11537</th>
<th>Respondent:</th>
<th>10774145 / P Jordan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website...
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of
housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/633  Respondent: 10774881 / Kate Cheyne  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7238  Respondent: 10775169 / Caroline Grafton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Please accept this email as my objection to the Local Plan. I objected to the last plan and GBC seem to have again
ignored what the local people think and I fully support the Guildford residents Association response and oppose
Guildford expanding by a quarter.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more
accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1779  Respondent: 10776225 / Roger Main  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
OBJECTIONS TO THE LOCAL PLAN

Policy S2 – Borough-wide Strategy

I OBJECT. There is no supporting evidence for the proposed number of homes (13,860). The assumptions used in the modelling are not given. It may be – as the Director of Development at GBC implies – that the Council does not know what the assumptions are. They are failing in their duty if they do not know. The data – again according to the Director of Development – is widely available, but the Council will not provide it, nor say what it is nor where it came from. There is a complete lack of transparency in the whole process.

It is unclear what the figure of 13,860 represents. The plan says it is the total number of new houses to be delivered by 2033. We do not know what numbers the model actually produced. We do not know why the plan does not take into account the routine small-scale developments and re-developments that already take place all the time within the borough.

The Director of Development wrote to the Surrey Advertiser trying to draw a distinction between the Objectively Assessed Need and the number actually achievable. It is unclear which numbers are being used in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12435  Respondent: 10778849 / Jonathan Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the staggering behaviour of a council which, completely out of character, suddenly proposes vast developments of an unprecedented scale with very poor justification which seems to mainly involve profit and individual gain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10158  Respondent: 10780929 / Naren Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
The housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1419  Respondent: 10782625 / Heather Alexander Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the disproportionate allocation of housing in this particular part of the Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13684  Respondent: 10782625 / Heather Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4331  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to register my objections to the above plan which are ill considered and ill thought through. It is ridiculous to think that over 13,000 new homes are needed by 2033, which is an increase of 25%. To facilitate this growth huge areas of the Green Belt will be sacrificed with only around 30% of new homes being built on Brownfield land. Not only that but no thought appears to have been given to what affect all this development will have on the existing infrastructure which will surely be a breaking point with increased congestion and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4333  Respondent: 10782689 / Murray Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed scale of new building in the area, which is disproportionate and unjustified. The housing target is unconstrained and I would challenge the assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4338  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all the other sites in the proposal, West Horsley, 3 Farms Meadow, Garlicks Arch, Blackwell Farm and the Hog's Back. All are out of proportion to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15274  Respondent: 10782689 / Murray Dudgeon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justication to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build...
homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a plan that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.
The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Go back to the drawing board with and don’t just fiddle with bits and bobs – re-think your whole plan.

And I’m not necessarily using the roads at peak times – thousands are!!

Simply ticking boxes is not planning!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/584  Respondent: 10783873 / G. M. Puddle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand there are proposals to build in excess of 500 houses on six sites in and around East and West Horsley, enlarging the village boundaries and removing the Green Belt designation within.

I strongly object to these proposals. The Horsleys have a unique character which would be hugely compromised if building went ahead on the scale proposed. The Green Belt designation should remain and on no account be removed. The Green Belt is there to protect the countryside from erosion due to urban sprawl and inappropriate building. Our countryside is precious and necessary for health and wellbeing.

Traffic is already heavy during rush hour and school pick up times, and Ockham Road through the village is always busy with traffic (including large lorries) cutting through from the M25 and A3. To add a substantial amount of local traffic to this would be totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7712  Respondent: 10784769 / Jane Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal S2 development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9120  Respondent: 10785633 / Penelope Eagle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal S2 development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 Spatial development strategy

I object to this policy part of the plan as the villages of Horsley and Ripley are designated as district centres, this does not reflect the facilities available at these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1133</th>
<th>Respondent: 10789985 / TREG Consulting (Waleed Al Qadoumi)</th>
<th>Agent: ECA (Martha Covell)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

This policy identifies a need for 12,426 new homes within the plan period (2015-2034) and the revised delivery rate of 450 dwellings per annum (dpa) in 2019/20 rising to 850 by 2033/34.

This development strategy relies on the allocation and development of Wisley Aerodrome, yet this is an isolated location and does not represent a sustainable form of development. Wisley Airfield Aerodrome is located between the settlements of Effingham and Ripley, but due to its location, very close to the A3 and its junction with the M25 people living here will be over-reliant on their car and very unlikely to use public transport.

We object to the allocation of Wisley Aerodrome for development on the grounds that:

1. This is an isolated location away from shops and services and this does not represent a sustainable form of development. The scale of development proposed (2000 houses) is not sufficiently large to support a sufficient number of shops and services in its own right and therefore residents will need to rely on the car to access other local shops, primarily in Ripley;

2. The site comprises a designated Special Protection Area (SPA), Important Bird Area, Local Nature Reserve and Registered Common Land is also located to the north of the disused airfield within Ockham Common. The northern part of the site is within the 400 meter SPA buffer where residential properties cannot be accommodated.

3. Approximately 17 ha of the airfield to the north west is safeguarded under the Surrey Waste Plan and should be preserved for this important strategic facility.

4. Aerodromes by their very nature have an open character and are within isolated locations and the character of this site, including its linear and open character does not lend itself to development.

5. The site currently serves a number of green belt purposes in terms of keeping land permanently open in accordance with Section 9 of the NPPF. It is unsound to allocate land currently within the Green Belt which serves these purposes for the following reasons:

*Purpose 3: To assist in safeguarding the countryside from encroachment.* The allocation of this site for development would lead to significant development encroaching into an isolated open Countryside location where there is currently very little development. It would have a detrimental impact on the open character of the area and countryside.

Purpose 5: ‘To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’. The former runway represents previously developed land, but it has an open character in an isolated countryside location. Development here has the potential to make alternative regeneration sites within Guildford less attractive to developers and potentially less viable.
A far more sustainable form of development would be to release green belt sites adjacent to large villages which already benefit from existing shops and services and are within a short distance to an existing train station.

Effingham is a sustainable location for development, yet the revised Local Plan fails to allocate any significant sites for development here despite it being within cycling distance from Effingham Junction railway station and containing a number of shops and services.

We support the areas around villages as sustainable locations for housing development and suggest that more housing is allocated in these areas as this is preferable to the allocation of Wisley Airdrome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/840  Respondent: 10798049 / Steve & Maureen Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have been through the Guildford Local Plan and have the following high-level comments to make:-

Infrastructure must come first and delivered in the appropriate order. Due cognisance must be afforded to the work being undertaken by Highways England with regards the A3 prior to any other major roads being considered (such as the CLLR). As part of any infrastructure work constant monitoring of air quality must be paramount as Guildford has a poor record in this area.

I am also concerned that with so many new homes being planned, detailed studies are undertaken to ensure that services such as sewage, water and power are adequate to support the growth. Obviously we must build new homes where viable but GBC must ensure that a high proportion of these new homes are affordable or social housing to ensure that our young people can live in the borough.

GBC must pay due regard for the green belt, our environment and the preserving of AONB. I am totally opposed to the insetting of our villages (e.g. Jacobs Well) and removing them from the green belt.

GBC must also pay due regard and preserve our flood plains. They are there for a purpose and have served Guildford and Surrey well for hundreds of years. There should be no building of houses or roads on designated 3B flood plains or building in areas where the water tables and streams will be affected. It should be noted that AECOM high-lighted SARP as a project with significant flood risk.

With regards the many traveller pitches in the plan, for Guildford Borough, GBC must ensure that DCLG Planning Policy for Traveller Sites (August 2015) is applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/325  Respondent: 10799169 / Neal Basson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY S2 – Borough Wide Strategy

OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years.

It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing.

At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
• The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

A further study is attached which is included within this section by reference. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. We have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17518  Respondent: 10799425 / Guildford Greenbelt Group (Susan Parker)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Ministerial guidance in relation to building on the Green Belt is clear:

“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

2. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/538  Respondent: 10799809 / Judy Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the local plan proposal to build so many houses in Send & Ripley area. Of course some new houses are required but Send and Ripley seem to be taking a disproportionate share of Guildford borough’s target and this feels unfair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7664</th>
<th>Respondent: 10803297 / John Collomosse</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the scale of development for Ripley and Send in the Plan

I object to the balance of new housing being shouldered primarily by Ripley and Send. There are virtually no employment/jobs in these villages but much of the borough’s housing target is being deployed in these two villages via Garlick’s Arch (400 houses) and the Wisley Airfield (2100 houses). Surely it makes sense to rebalance this allocation so that most of the housing is local to Guildford where people will want to work or catch a train to work from (there are no practically accessible stations near these proposed developments). There are other available options such as the University owned land that could have been used to develop a new quarter of Guildford fulfilling much of the housing target – why has this not been identified in the strategic plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13278</th>
<th>Respondent: 10803809 / David Jones</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the 2016 Draft Local Plan as follows. I believe the Local Plan will have a direct and detrimental effect on the amenity currently enjoyed. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed with no real consultation being undertaken with the residents. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
OBJECT. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/838  Respondent: 10804961 / M. Basson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Council needs to completely rethink its priorities and very carefully consider the views and requirements of the borough’s residents. We need a less contentious and more viable plan, which proposes a sustainable and suitable level of development. The use of brownfield sites should be high on the agenda.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/603  Respondent: 10804993 / Alex Laing  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

I object to the disproportionate amount of development in one area of the borough (i.e. to the north east, where I live)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the potential six main development sites contained in the Draft Local Plan which are located in and around the Horsleys;

Please ensure that my comments are available for the Independent Inspector's consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter. I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. I have three major concerns:

1. The scale of the housebuilding programme. The target outlined by GBC represents a 25% increase in the housing stock of the borough. The Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

2. The destruction of the Green Belt - I note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. GBC is in breach of this policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be built on land that is currently Green Belt; and

3. Infrastructure - the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

These comments are developed in more detail below.
1. STRATEGIC POLICIES

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough. The justification of this number, when the Office of National Statistics (“ONS”) is projecting a population increase of some 15% for Guildford Borough over this same period is not given.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

I cannot understand this analysis. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion.

I therefore OBJECT to the borough housing targets set out in Policy S2.

3. PROTECTING POLICIES

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P2: Green Belt

Local Plan Policy P2 states that: We will continue to protect the Metropolitan Green Belt.

Unfortunately, GBC is in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. This is an outrageous outcome.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (“AONB”) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. This is incomprehensible.

I therefore OBJECT to the proposals to build on the Green Belt.

6. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

The detailed infrastructure proposals for Guildford Borough which give me cause for concern.

There are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

In East Horsley today:

? Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

? The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit;

? Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;

? The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult,
for example, for people with pushchairs or prams or in wheelchairs;
? There are insufficient school spaces for the number of local children needing them;
? The Medical Centre in East Horsley is already at capacity in terms of its number of patients..
In respect of East Horsley, there are only two specific proposals in Appendix C:
LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and
HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.
There are no proposals in respect of all the existing problems with, for example, roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.
Although an expansion of the Medical Centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.
The failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.
I accordingly OBJECT to the infrastructure proposals on these grounds. I further OBJECT to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11764  Respondent: 10805537 / Robert Mote  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal to build 13,860 new houses without proper constraints in order to reduce the overall housing deficit differs from all the other Borough Councils in Surrey.
The Plan is biased and not fairly spread across the borough. There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Why is 36% of all the Plan’s new housing being proposed in this area, which has only 11% of the existing housing.
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is biased and not fairly spread across the borough. There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Why has this area been proposed to meet 36% of the Plan’s new housing, whilst it currently has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

Objections to Local Plan

I object to this plan because the Council has no mandate to allow development in the Green Belt. The controlling Conservative group was elected in 2015 on a promise to protect the Green Belt.
I object to the removal of Ripley, Wisley, Clandon, Send, the Horsleys and many other villages from the Green Belt which will lead to the destruction of our rural villages.

I object to the plan because Guildford Borough Council shows little understanding of the countryside and of the heritage of the borough.

I object to this Plan which would damage the environment and character of the Borough.

I object to the disproportionate number of houses proposed for the locations North and East of Guildford

I object to the lack of evidence for the proposed housing numbers -13860 -693 per year for 20 years. The assumptions on which the consultants prepared the SHMA have not been given to the public or to councillors.

I object to these housing figures as they were prepared pre-Brexit and must now be revised downwards. Independent assessments suggest some 300-325 houses per year would be adequate.

I object to Surrey University not building 2000+ units of student accommodation [for which it has permission] on its campus. This would free up family housing in the town.

I object to the proposed numbers also because the recognised constraints [eg 89% Green Belt, inadequate infra structure] have not been applied.

I object to the excessive density proposed for the major strategic sites.

I object to the impact of poor air quality on many of these major developments in breach of Air Quality Directives.

I object to lack of detail on financing of massive infrastructure eg roads and schools, which would be needed from Surrey County Council and the Highways Agency.

I object to the lack of information on how the new Hospitals and GP surgeries which will be needed will be funded.

I object to any villages being taken out of the Metropolitan Green Belt and swamped by significant housing development.

I object to the increased traffic congestion which will be caused on the M25, A3, other A roads and small rural roads.

I object to the ludicrous suggestion that many will resume walking and cycling-most journeys will require a car and public transport from the villages is poor.

I object to Three Farms Meadow [former Wisley Airfield] being removed from the Green Belt and included for housing. It is totally illogical to include this site which was comprehensively rejected for some 14 significant reasons earlier this year.

I object to developments at Blackwell Farm, Gosden Farm, Garlicks Arch and Wisley as this effectively merges all the villages along the A£ from the M25 to the Hogs Back with no provision for improvements to the A3 or local roads.

I object to the proposed SANG at Long Reach West Horsley which would be used to support some 1000 homes in a very small village.

I object to all sites in West Horsley where more than 5 houses are planned

I object to these sites within West Horsley

Manor Farm A

Bell and Colvill A37 –already rejected by the planning committee

Land at Ockham road North A39
I object to these sites in East Horsley

Ockham Road North A39

Thatcher’s Hotel A36 - already rejected.

I object to these plans for the Horsleys which seem to be an attempt to create a small town.

I object to the failure of GBC to follow a “brownfield first” policy.

Finally I object to the document. In the form of 1,800 pages it is not user friendly and is out for consultation for only 6 weeks during the summer holiday period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/797  Respondent: 10806881 / Fran Connolly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the Guildford Borough Proposed Submission Local Plan: Strategy and sites: June 2016 with reference to impact on The West and East Horsley Villages.

- why are we building on GREENBELT land - this is land that has been protected so far for good reason. Why now should we be considering building on this land when there are surely other feasible sites which are not Greenbelt?

- why are we planning to build additional houses in an area which is already saturated from a schools (Raleigh, Howard of Effingham running at capacity with waiting lists already), from a medical perspective

- these are villages and do not have good enough roads, to cope with all this additional traffic

How can you put this plan forward without considering the impact on the local residents within the village or indeed what the impact will be if the houses were to be built. As part of the plan it must be seen that the houses are not built on Greenbelt Land and that if any new housing is erected on suitable (not Greenbelt land) then increased infrastructure (eg schools, medical, roads, shopping, public transport) are also included.

I re-iterate that I strongly object to this plan for the above reasons and hope it will be denied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11042  Respondent: 10809377 / Bernice Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12363  Respondent: 10811681 / Linda Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1271  Respondent: 10815553 / S.G.E. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft 2016 Local Plan in its entirety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1275  Respondent: 10815553 / S.G.E. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that only a short amount of time has been allowed to the residents and have not been consulted before these plans have virtually been thrown at us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1276  Respondent: 10815553 / S.G.E. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that not only has the main plans been organised quickly then another extra plan has been placed on top of it within 2 weeks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1278  Respondent: 10815553 / S.G.E. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that who has estimated the amount of dwellings and other buildings to be added to such a small area there are far larger areas of unused land in the Surrey area without encroaching on the small villages hereabouts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1284  Respondent: 10815553 / S.G.E. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I finally object to the reason why this part of beautiful [text unreadable] with so many nice people living in peaceful villages should suffer because a few people with great minds? And the want of money should [text unreadable] out space (green belt) and properties.

I wish we could hear someone's answers to our objections and make them fit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of East Horsley I write to **OBJECT** most strongly to the Proposed Submission Local Plan – Strategy & Sites consultation document, which includes plans to develop a massive 593 new houses in the Horsleys, and a new 2,000+ house village at Ockham (former Wisley Airfield), notwithstanding the enormous amount of concern and objections expressed by local residents in the last couple of years.

Why do we have to, yet again, write to express our objections to all of the proposed developments. This process is clearly designed to wear the local residents down until the plans get implemented.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). My objections are as follows:

1. **I object to the Local Plan as the proposed developments are not sustainable**

   The proposed 13,850+ new homes in this tiny area are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. There is no public transport to speak of, only the occasional bus service which has already been cut back. Wisley Airfield and Garlick’s Arch have no railway stations, so almost every adult will have to drive their own car. It is already difficult to cross main roads as a pedestrian; more traffic will make it impossible and extremely dangerous.

   The development should be in more urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1656  **Respondent:** 10816705 / Maggie Cole  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---

7. **I object to the Borough Wide Strategy**

   There is too much development in the north east of the borough (Wisley, Ripley/Send and Clandon). Why is 36% of the entire Plan’s new housing proposed in this tiny area? Why are other areas not being proposed?

   5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation with the loss of village identities. I was always under the impression it was Council policy to keep each village separate and retain their individuality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/12186  **Respondent:** 10816993 / Jane Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s ‘need’. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Having carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation my comments are set out in this below in this email.

**Policy S2: Borough Wide Strategy**

I OBJECT to this policy as I believe the figures used to calculate GBC’s annual housing target are incorrect.

The policy is based upon a projected net increase of 25% in the housing stock of Guildford Borough over the period 2013-2033. This is equivalent to adding 693 new homes per annum or 13,860 new homes over the period of the proposed Local Plan.

The ONS on the other hand projects a 15% increase in population over the same period.

In addition the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised, estimates that 517 homes per annum arise from ‘the demographic starting point’. This is effectively what the Office of National Statistics (ONS) and the Department of Communities and Local Government ("DCLG") are predicting GBC will require based upon their population and household forecasts. It would appear from the SHMA that there is some “double counting”. For example, the SHMA has added another:

- 120 homes per annum in order to ‘support economic growth’
- 31 homes per annum to ‘improve affordability’
- 25 homes per annum due to ‘student growth’

This increases the original per annum figure of 517 new homes by 176 to reach the 693 annual housing target.

I find this strange as:

- Surely economic growth is already factored into the statistics produced by ONS and DCLG.
- The GBC Affordable Housing Policy H2 proposes that all development sites (other than the very smallest) must have 40% of their homes offered as affordable housing. Thus these would already be included in the 517 homes proposed.

It appears therefore that what GBC is proposing is actually above the official household growth forecasts for the borough.

In addition, the decision of the UK to leave the EU has seen the government and Bank of England forecast that economic growth will be reduced. This further brings into question the number of homes added to the ONS/DCLG figures.

The National Planning Policy Framework (NPPF), paragraph 158, requires GBC to base its development plan policies on up-to-date and relevant evidence. I believe it can be seen from the above that this is not the case.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/1160  **Respondent:** 10818529 / John Hales  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
**The Borough Wide Strategy (Policy S2)** for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey, highlighting how singularly out of touch the proposers of this policy are with the local community. The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. The 5,036 houses proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12226</th>
<th>Respondent:</th>
<th>10819009 / Sheila Griffin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

In addition I object to any green belt land and areas of outstanding beauty being used for housing. Brownfield sites should be used for this purpose instead of building shops and offices. We have enough shops and business premises in Guildford. Your council should force the University of Surrey to fulfil its obligation to build adequate accommodation for students and staff at Manor Park. They have planning permission for this. This would free up a large number of houses for local people who are trying to buy or rent accommodation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9766</th>
<th>Respondent:</th>
<th>10819489 / Susan Cooper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the overall strategy

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12813</th>
<th>Respondent:</th>
<th>10820417 / Trevor Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

- I object to the proposal for a large industrial development is ill defined and unsustainable. It could mean anything between 250,000 sq ft and 750,000 sq ft of development. It will create a huge amount of traffic problems and is utterly undesirable in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12817  Respondent: 10820481 / Lisa Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12818  Respondent: 10820481 / Lisa Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal for a large industrial development is ill defined and unsustainable. It could mean anything between 250,000 sq ft and 750,000 sq ft of development. It will create a huge amount of traffic problems and is utterly undesirable in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13932  Respondent: 10822913 / Karen Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

This local plan seeks to reduce overall development in town centre and urban areas compared to 2014 by almost 10% and instead seeks to increase the overall housing development in rural and green belt villages by insetting 15 villages. The proposed increase in rural areas from 2014 to 2016 is almost 12%. This is totally disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**

---

**Comment ID:** PSLPP16/792  **Respondent:** 10826497 / Barry Vince  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the new local plan.

My areas of concern:

Lack of protection of Green Belt.

Disproportionate housing development in our area, overloading schools, health services and public transport stations. hospitals.

Traffic concerns on trunk roads and lanes.

Air pollution from thousands of extra cars, affecting elderly people and children.

Pedestrians and cyclists safety on overcrowded local roads with no footway.

No guarantee of enough affordable housing for young families.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**

---

**Comment ID:** PSLPP16/12015  **Respondent:** 10828801 / Kathryn Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt.

4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16783  Respondent: 10828897 / Christopher Merrick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A more reasonable house building target be reached and agreed by the Guildford residence, hopefully keeping the balance and character of the borough.

The revised housing development target could be met by building on redundant factory and office/commercial sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9623  Respondent: 10828993 / Naomi Rider  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the grossly overstated future housing need that underpins the Guildford Borough Plan. I accept new housing is required, but I question the assumptions that have been used. I believe if a more realistic assumption was used, it would be possible to accommodate new housing within existing urban brownfield areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6625  Respondent: 10829121 / Julie Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to POLICY S2 –Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.

- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3797</th>
<th>Respondent: 10829281 / Kevin Nicholls</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

Sir/Madam, we all understand the need to provide additional housing but to do so in such a disproportionate way will have a devastating effect on our communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3109</th>
<th>Respondent: 10829409 / Anne Fulton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to disproportionate allocation of housing in localities of Ockham, Ripley, Send & the Horsleys (of which 65% is allocated to FWA/TFM an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the way that the previous response to the proportion of houses to be built in the village has been ignored and instead has been increased. There seems to be no valid reason for this as a) the situation post-Brexit is likely to been entirely different, and b) the number and types of houses to be built cannot be justified as we do not seem to be able to examine the way they were worked out.

I object to the way in which the proposals have been put forward as I don't believe the proper legal processes have been followed. Such development has serious consequences in relation to the quality of life for those in the immediate vicinity. Our already congested area will suffer years of disruption followed by a lifetime of over stretched facilities the promises of large developers to offer affordable housing and infrastructure (affordable to whom, we might ask?) are well-documented to be entirely unenforceable in reality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16351  Respondent: 10833025 / M Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create alot of additional pollution due to traffic.

Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16320  Respondent: 10833089 / J Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield (the subject of which I have written to you twice before), 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm, because it will destroy large areas of Green Belt and agricultural land, massively increase congestion on the A3 and the surrounding villages such as Ripley and Send, and create alot of additional pollution due to traffic.

Use brownfield sites which are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3867  Respondent: 10833537 / AC Vause  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The Housing number is based on pre-Brexit data for economic and population growth, including mi These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or on any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Borough Wide Strategy

In my opinion the Plan is unbalanced: 36% of all the Plan’s new housing is proposed in the north-east area of Guildford: (Wisley [A35], Ripley/Send [A43] and Clandon [A25]) where there is currently only 11% of the current housing. A staggering amount of housing: 5,036 new homes are proposed on the 5 mile stretch between the M25 and Burpham. This will result in a merging urbanisation of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16678  Respondent: 10836033 / Katherine Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

In my opinion the Plan is unbalanced: 36% of all the Plan’s new housing is proposed in the north-east area of Guildford: (Wisley [A35], Ripley/Send [A43] and Clandon [A25]) where there is currently only 11% of the current housing. A staggering amount of housing: 5,036 new homes are proposed on the 5 mile stretch between the M25 and Burpham. This will result in a merging urbanisation of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1054  Respondent: 10837217 / Gillian Dobb-Ponds  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

If the occupants of all these new houses want work in London the underground will be chaos and accidents will take place. Houses should be built in the Midlands and up north. The government should encourage firms to move out of London. There are many unemployed up north and houses are much cheaper.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/191  Respondent: 10838433 / M.D. Chandler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Why this government has to pack south of London with new builds astounds me, surely it would be better to build north of the city and not crowd the south any more than it already is.

Therefore I am against the amount of houses preposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2329  Respondent: 10843521 / Yvonne Woozley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a somewhat rudimentary map of all the proposed development the impact of the changes can be seen in their entirety (See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14905  Respondent: 10843905 / G King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to the disproportionate amount of development proposed for the east of the borough, the Horsleys, Wisley, Ockham, Ripley and Send. The proposed developments of A25, A35, A36, A37, A38, A39, A40, A41 and A43 do not respect the character and density of housing in the area, a requirement of The National Planning Policy Framework (NPPF).

I strongly object to these proposed developments within the plan and the lack of planned improvements to infrastructure and services. I object to the detrimental impact on transport, local roads and road safety. I object to the proposed high density development along the A3 corridor when this road is already at full capacity and struggling to cope. Rail commuters will drive to the stations, Woking, Clandon, Horsley and Effingham which already have full car parks. The village centres will be gridlocked by the amount of people trying to transition through them and lose their sense of community. The green belt will be destroyed and the village areas will combine to look like a suburb of London. Guildford Borough is renowned for its towns, urban spaces and contrasting rural and wooded countryside and villages it will be ruined forever under this proposed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11863  Respondent: 10844545 / Paul Cretney  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed development sites in East and West Horsley on the grounds that the number of houses being proposed is far too excessive. The local amenities could not cope with such an increase. Local roads are already busy enough and poorly maintained, schools are over subscribed and doctor appointments are difficult enough to get already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10172  Respondent: 10844609 / Sam Critchlow  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12371  Respondent: 10844993 / Simon Wright  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC need to realise how important the Green Belt is, and stop treating it as a free space to indiscriminately destroy for generations to come.

This Local Plan seems to have been thrown together with no real thought, we need a ‘common sense’ Local Plan, not this rubbish.

It appears that GBC are desperately and naively clutching at straws to find what they think are suitable sites to include in the Local Plan, instead of carefully identifying already suitable Brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

THERE IS ENOUGH BROWNFIELD SITES AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16300</th>
<th>Respondent: 10845537 / Chloe Moore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>disproportionate amount of development in one area of the borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16305</th>
<th>Respondent: 10845569 / Stu Edwards</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>disproportionate amount of development in one area of the borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1006</th>
<th>Respondent: 10846145 / Phillipa Bottomley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I am supportive of local development and an increase in housing, but my principal concern with the Local Plan is that it treats each development separately without considering the impact of the cumulative effect of these developments on schools, roads, public transport, medical centres and hospitals.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I am also concerned that this process is being re-iterated with what appears to be little impact from earlier responses which makes me increasing convinced that this is being undertaken to appear to take account of the views and insights of current residents rather than develop an integrated and sustainable development of our area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11993  Respondent: 10846401 / Karen Chizlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am emailing to object strongly to the revised local plan for Guildford.

I still cannot believe that number of houses that are supposed to be built round here is so high. Why have we not been given the method of calculation of the figure? It seems incomprehensible that no-one in the Council has investigated this.

Where are all the cars going go - roads are currently grid-locked on many occasions and things are only going to get worse.

The whole plan seems to be totally ill-conceived, not properly consulted & local residents are NOT listened to.

I could go on & on & on...

I realise that we need new houses and loads more affordable ones, but not on Green belt.

Get a grip and do the right thing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14456  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I request a confirmation by email from GBC that all of the objections made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

1.2 I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

1.3 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity.

1.4 I object to GBC adoption of an inflated OAN of 13,860 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.
I object to the persistent confusion between housing demand and housing need which continues to distort the characterization of future housing development across the borough.

I object to the failure of Policy S1 to provide a meaningful definition of “sustainable development” or to set out any principles for applying sustainable development in practice to local planning decisions.

I object to GBC’s promise “to secure development that secures the economic, social and environmental conditions in the area” whilst omitting to recognise that economic growth, social justice and environmental protection often conflict.

I object to the failure of Policy S1 to say how each element of its sustainability promise is to be weighted or conflicts resolved. Under this policy, any development will qualify as sustainable, which makes a mockery of the NPPF’s most important guideline.

I object to GBC’s commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

I object to the way in which Policy S1 policy also ignores the majority of the 12 Core Planning Principles set out in NPPF paragraph 17.3

I object to GBC’s failure to apply constraints to housing need. The application of constraints is a sensible and practical approach to development within the borough and is not only what GBC have done in the past in previous plans but is also what its neighbouring local planning authorities continue to do.

I object to the scale of the housing number proposed in this plan. The scale of GBC’s ambitions, which will be felt for decades into the future and irreversibly harm the local environment, demands that a high burden of proof on GBC to demonstrate that the plan is sound. A substantially lower number of 5,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I object to this local plan on the grounds that GBC has failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in GBC’s ownership and it would seem a practical and readily achievable alternative, much more acceptable to local residents.

I object to this local plan on the grounds that the proposed local plan relies on outdated thinking and practices. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14520  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1.1 I object to policy S2, on the grounds that;

1.2 GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.3 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes and identified in their own SHMA that “it should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

1.4 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

1.5 In the current plan GBC have ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.6 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS (an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA)) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

1.7 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.8 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions
consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

1.9 A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA1.10 The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

- the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
- there should be no increase for affordability above basic demographic change.
- there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
- the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1095  Respondent: 10846625 / Frank Drennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. The 19 page report by NMSS, which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”, has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses. The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

1.1 I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

1.2 I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 I formally request the opportunity to give evidence in person at the Public Inquiry currently planned for 2018 in relation to my objections in 2016 and 2017.

1.5 I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Council for resubmission.

1.6 I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

1.7 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.8 70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate.

1.9 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.10 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.

1.11 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.12 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.13 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand,
would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.14 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.15 In my opinion much of the updated local plan still appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.16 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.17 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.18 I regret that my conclusion is that this plan is a clear example of bad planning.

6.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

6.2 The OAN “objectively assessed need” figure of 12,426 is far too high

6.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. 1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

6.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

6.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

6.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.
6.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

6.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

6.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

6.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

6.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

6.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

6.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

6.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

6.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

6.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

6.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

6.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.
6.20 House of Commons Briefing Paper; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

6.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

6.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

6.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

6.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1770  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

My objections are as follows:…

1. **I object to the Local Plan as the proposed developments are not sustainable**

The proposed 13,850+ new homes in this tiny area are not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. There is no public transport to speak of, only the occasional bus service which has already been cut back. Wisley Airfield and Garlick’s Arch have no railway stations, so almost every adult will have to drive their own car. It is already difficult to cross main roads as a pedestrian; more traffic will make it impossible and extremely dangerous.

The development should be in more urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1774  Respondent: 10848513 / Martin Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
### 7. I object to the Borough Wide Strategy

There is too much development in the north east of the borough (Wisley, Ripley/Send and Clandon). Why is 36% of the entire Plan’s new housing proposed in this tiny area? Why are other areas not being proposed?

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation with the loss of village identities. I was always under the impression it was Council policy to keep each village separate and retain their individuality.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPP16/807  
Respondent: 10848705 / John Woodcock  
Agent:  

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. I object to <strong>the disproportionate amount of development on one area of the borough</strong>. In previous drafts of the plan, development areas were spread more evenly, whereas this draft enables planners to go ahead with proposed strategic sites totalling nearly 7,000 homes in a relatively small area in or around Ripley and the Lovelace area. None of the proposals so far put forward make any serious effort to address the infrastructure issues. Roads are already clogged, not just at peak times and the many thousands of extra vehicles which these developments will generate cannot be supported without significant new infrastructure.</td>
</tr>
<tr>
<td>2. 1. I object to the <strong>limited consultation period</strong>. In previous drafts of the plan, there was time for communities to review, discuss, query and respond properly to the plan, whereas, the “unseemly” haste within this latest draft is unacceptable.</td>
</tr>
<tr>
<td>2. I object to <strong>last minute inclusion of new sites</strong> with less than two weeks notice. My reasons are as in 4 above.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the disproportionate amount of development in one area of the borough, we have had enough done our bit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/756  Respondent: 10851201 / Jon Woollard  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that mention has been made of land at the tennis and cricket club at the top of Pennymead Drive. Are we not to have any recreational areas. Similarly the land at Kingston Meadow, which is enjoyed by everyone for sport, walking with dogs and for the village to come together to celebrate special occasions such as Jubilees and the Queen’s Birthday. I am completely lost for words that GBC can consider building so many houses in a lovely area and spoil it for everyone. At one time it was considered safe to be within a Green Belt area, so why are you allowed to now relax those rules. I understand that people need housing, and I have no objection to houses being built in small pockets around the village eg. The Telephone Exchange Land, and I understand the need maybe for housing on Wisley Airfield, BUT ONLY PROVIDED the aforementioned facilities are put in place, SCHOOLS, DOCTORS SURGERY, POST OFFICE, SHOPS AND RECREATIONAL FACILITIES.

Please please, give more consideration before you ruin a very lovely part of our country and turn us into a suburban community instead of a rural one.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7837  Respondent: 10852289 / Barry Scott  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford plan which has not identified sufficient brownfield sites within the urban area and includes 70% of the proposed housing of 13860 targeted in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9806  Respondent: 10853249 / Evan Parry-Morris  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Unbalanced development in one area of the Borough

There appears to be a large part of the proposed new housing concentrated between the M25 and Burpham. I object to my local area being subjected to such a large proportion of the allocated development, when it would be better spread more evenly throughout the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7170  **Respondent:** 10854113 / Sarah Pickering  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**WE OBJECT** to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

---
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2169  Respondent: 10855553 / Emma Tallick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/620  Respondent: 10855777 / Ian Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to object to many of the local plans proposals in the “draft local plan” released by Guildford.

“Government advice is unmistakably clear – that housing needs alone is not adequate grounds for building on the green belt…”

Having lived in the borough for over 20years with my wife & family. I have seen the area evolve, but this plan is a ridiculous proposal and grossly over numbered. I don’t want to see the area ruined by sprawling inter linked “villages” and miles of houses just because it “looks a good idea on paper”. It’s the “Green-ness” and the many villages that make the area. Kill that with concrete and you will kill the heart of Surrey for ever. This isn’t one of the most expensive places in the country to live for nothing– there is a reason!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/623  **Respondent:** 10855777 / Ian Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the last minute inclusions of new sites
  - Garlick Arch (Policy A43 – 400 houses and industrial units)
  - North and south bound junctions for the A3 to the A247 Clandon
  - Gosden Hill, Merrow of 2000 houses
- I object to the increase in traffic these proposals will have on the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

---

**Comment ID:** PSLPP16/11219  **Respondent:** 10856353 / David Howells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

S2 I object to the 2016 Draft Local Plan as I believe that it would be detrimental to the quality of life for those living, or indeed coming to live, in the borough. I made a number of comments at the time of the 2014 draft plan and I am pleased to see that some of my concerns are now acknowledged in the 2016 Draft Plan. I say acknowledged because they are mentioned as issues, but without any clarity as to how they will be dealt with. My objections therefore continue to be:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

---

**Comment ID:** PSLPP16/11224  **Respondent:** 10856353 / David Howells  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---
• S2 The assumptions about the number of houses needed by 2033. No doubt this figure, which I already find suspect, was prepared before the Referendum decision to Brexit. Politicians have repeatedly warned that this will cause house prices to plummet (due to falling demand) and that immigration numbers will fall, thus reducing pressure on future housing needs. The housing need should therefore be reassessed in the light of the country's decision to leave the EU.

• S2 I apologise for the brevity of this response to the 2016 Draft Local Plan, but I simply have not had time to consider all 255 pages in the short period of consultation allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14641   Respondent: 10857249 / Alice Pashley   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging...
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy S2: Planning for the borough – our spatial development strategy

I OBJECT to this policy.

13,860 homes are proposed. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area.

It is inappropriate to allocate this housing number, either over the plan period or across projected sites, when the number is unsubstantiated.

Eminent external consultants and members of the public have shown that the OAN is flawed and overestimates the housing need.

Furthermore constraints, which are especially needed in a gap town, have not been applied

If the housing number were substantially lower, and only met real housing need, there would be no need to build on Green Belt or open countryside, or to over cram the town with high-rise buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy S2: Planning for the borough – our spatial development strategy

I OBJECT to this policy.

13,860 homes are proposed. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area.

It is inappropriate to allocate this housing number, either over the plan period or across projected sites, when the number is unsubstantiated.

Eminent external consultants and members of the public have shown that the OAN is flawed and overestimates the housing need.

Furthermore constraints, which are especially needed in a gap town, have not been applied

If the housing number were substantially lower, and only met real housing need, there would be no need to build on Green Belt or open countryside, or to over cram the town with high-rise buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: New local plan

I am writing regarding the revised local plan you have recently published which, despite its volume (no doubt designed to befuddle those who elect you), appears to wholly ignore earlier feedback and to contain fatal flaws.

Firstly, as regards likely population demands, your projections (such as they are) need to be re-visited in the light of Brexit. Your proposal for up to 533 new homes in the Horsleys with possibly another 2,000 on the Wisley site (under two miles away) would represent a disgraceful urbanisation of what is still a predominantly countryside area, with little thought given to the infrastructure consequences and certainly no guarantees that these will all be addressed in advance of any building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12843  Respondent: 10858401 / Philip Kite  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Ripley has already done more than its fair share of new building(over 100 new builds in the last few years), take the burden somewhere else.

Now that we are out of Europe will we need this extra housing anyway?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7850  Respondent: 10858625 / Susan Tyzack  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It's not too late to go back to the drawing board and avoid years of being thought of as the administration that ruined so many lovely areas. We'd all accept some development - but please keep it in fair proportion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8441  Respondent: 10858945 / C P Faithful  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Objections to Guildford New Local Plan

This proposed plan places impossible burdens on the Horsley area and will create an unsustainable load on services, facilities and lifestyle in the area.

The Plan is based on unverifiable data not in the public domain and is based on forecasts not substantiated by any real facts.

The Plan should be revised with real facts and figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18587  Respondent: 10858977 / Angela Otterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.
A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

- the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
- there should be no increase for affordability above basic demographic change.
- there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
- the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.
Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately **500 homes per annum** would appear to be a correct estimate of OAN for Guildford. However, **this is before constraints** are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in **exceptional circumstances**, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

**THE NEED TO APPLY CONSTRAINTS**

Ministerial guidance in relation to building on the Green Belt is clear:

> “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” – Nick Boles to Sir Paul Beresford MP 7th February 2014.

> “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

> “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.
In view of the comments above it would appear logical to apply **CONTRAINTS** in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable **HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes.** All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

I have recently (9 July 2016) had a meeting with Sir Paul Beresford my own MP for Mole Valley who has kindly assured me that he is in the process of speaking to the Secretary of State to **ratify the current government policy of protecting the Metropolitan Green Belt** and to instruct the Planning Inspectorate and Local Planning Authorities accordingly. This is in the wake of the recent national referendum and the likelihood of the easing pressure on international immigration over the next 20 years.

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister in waiting, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
FINALLY

I believe this plan is ill conceived, uses misleading data and contains many fundamentally flawed assumptions and errors. I do not believe it can be achieved and as a template for the Borough going forward it gives a depressing glimpse of a chaotic future where a great deal will be lost for short term gain in the hands of the few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/9764  Respondent:  10859489 / Jennifer Procter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GREENBELT AND BROWNFIELD

I object to the the fact that 70% of the building proposed in this Local Plan is in the Greenbelt and strung along the A3 where it will not only remove valuable countryside forever but will destroy the openness of the Greenbelt and effectively join up town and villages as well as creating impossible traffic congestion on the A3 and local roads.

I object the relatively small amount of development for Guildford Town centre and the complete failure of GBC to identify and promote sufficient brownfield sites within the urban area, where much more is possible. It almost completely ignores the proviso of 'brownfield first'. Walnut Tree Close, which represents a very real opportunity for housing provision has mysteriously become 'high flood risk' in this plan despite the fact that it is already built upon and new buildings continue to be constructed there. There are many ways to mitigate flood risk. It is interesting that this risk does not seem to be a bar to proposed rural sites which flood regularly.

I object to GBC using taxpayers money to buy consultancy which continually fails to meet their objectives. The station development, another big opportunity for housing is constrained by very precise size and height requirements which make it difficult for imaginative planning to apply. More imaginative approaches to the issues could achieve much better results.

The concentration on retail in the town centre is a further restriction on housing provision. Guildford has adequate retail provision and there is no big demand for more. Retail is less and less needed as so much shopping is now done on line and this trend will continue. If Guildford wants more retail it would be wise to provide housing first and the demand for retail would follow. As it is, pushing development into the countryside will hugely increase external traffic coming to the centre and exacerbate the already congested access problems. Under this circumstance alone retail is likely to fail.

I object to the fact that this plan will fail to deliver anywhere near enough 'affordable housing' despite the promotional exercise on the GBC website where key workers talk of the benefits of the plan. This sort of PR, again at tax payers expense, is highly misleading. The lack of building in the town centre where key workers are most needed and access to work and public transport is available is an indictment of the intent. Guildford Borough is a commuting area and over building in the countryside will only create more commuters. Moreover this housing will not be 'affordable'. These will be executive homes and will be expensive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/1943  Respondent:  10859489 / Jennifer Procter  Agent:
POLICY S2 PLANNING FOR THE BOROUGH

1.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

1.2 The OAN “objectively assessed need” figure of 12,426 is far too high

1.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

1.5 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

1.6 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.7 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.8 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

1.9 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

1.10 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

1.11 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census
figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

1.12 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

1.13 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

1.14 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

1.15 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

1.16 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

1.17 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

1.18 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

1.19 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

1.20 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

1.21 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

1.22 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 I have focused, as requested, on changes.

1.2 I object to the plan because it does not address local need and the changes do not take account of my own previous objections or the thousands of other valid objections made by residents of Send and other areas to the 2016 version. It appears that GBC is predetermined to release huge tracts of Greenbelt land for development and to push through this agenda despite all reasoned opposition. This makes a mockery of public consultation and the notion that local people have a say in what happens with regard to local planning.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.5 I object that the GBC decision not to apply constraints. This could mean that GBC is required to take overspill from neighbouring Boroughs that are themselves applying constraints. Send and neighbouring villages are the Greenbelt between Woking and Guildford. It is nonsense to suggest that Woking Greenbelt will be protected if the proposed developments in Send, and at Gosden Hill go ahead, as they will effectively join up the two towns and do away with the greenbelt separation for both.

1.6 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have done. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.7 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.

1.8 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed, while in the region of 40% is to be situated on Greenbelt land in the East of the Borough. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development”. This is normally an integral part of forward planning and development control.

1.9 Very little, if any or the proposed Greenbelt development will provide the affordable accommodation the country and local people so badly need. At 80% of market value on Greenbelt land around London with further reductions in quantity likely when developers play the viability card the stated purpose of the whole exercise will be lost. The SHMA (West Surrey Strategic Housing market Assessment, September 2015, Final Report) pg. 97, section 6.55 highlights “the analysis above indicates a notable need for affordable housing...” and Table 44 states that the proportion of affordable housing need as a % of the total need is 88%. GBC’s plan will not deliver this. Creating ever more unaffordable housing will put greater strain on local essential services and require more of the type of people least likely to afford the housing. (shop workers, nurses etc). This further undermines the sustainability of the plan, and once more highlights GBC’s intent to build more houses in flagrant violation of best planning practice. The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In my opinion much of the updated local plan is not up to date in current trends. The well reported and acknowledged decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs have been largely ignored.

Assertions that there is real demand for the expansion of retail, industrial or office space lack credibility. Significant planned expansion of residential development in the town centre is universally acknowledged as a key stimulant for urban economic growth and health. Without this the town could suffer further stagnation and serious economic loss.

There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians. Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt. Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

I regret that my conclusion is that this plan is fundamentally unsound and a clear example of bad planning.

2 EVIDENCE BASE

I object to the fact that the evidence base is poor and that there is a lack of sound property market research relating to the local market in Guildford. To rely, as previously, on generic economic capacity forecasts means that many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:

An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be
implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be
developed in different quantities by use class than has been consented.”

2.9 “There is the possibility that some pipeline developments may not come forward” is patently a weak argument
indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey
Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent
potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused
consents have not been used up is simple. There is a proven lack of demand.

2.10 Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local
Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in
Guildford’s urban areas and villages.

2.11 The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding
comparison retail space which is undermined by failure to implement existing retail consents at the North Street
development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in
relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail
requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16005  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The
hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on
Green belt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by
inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town
(the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified
as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89%
Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are
already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have
independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for
changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions
that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16007  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 PLANNING FOR THE BOROUGH

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum represents a reasonable level of housing growth for Woking and is deliverable.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:
· The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

· There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

· The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.
The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18614  Respondent: 10859553 / MARK Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3241  Respondent: 10860865 / John Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Document was made available, without much real publicity, to 'The General Public' who are only allowed an extremely short time to look at the Document; digest the contents; try to understand the contents; compile a list of comments; prepare that list into a letter or email; send such letter or email to GBC before the final date for receipt of any objections.

The Document is presented in a very user unfriendly manner - people cannot readily find what sections are applicable to them; there are often several sections with seemingly unmatched information;very little proper cross referencing;it seems to be presented in a manner with the prime intention of bamboozling any member of 'The General Public' who dares to look at it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15655  Respondent: 10862977 / Neil Langridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my objection to the Guildford Local Plan. While there are positive elements, it includes a number of fundamental flaws to the strategy and implementation of the plan that makes it completely unsound and not fit for purpose. Should it be implemented in its current form, it would constitute a complete dereliction of the duty of Guildford Borough Council (GBC) to the community.

GBC are unable to demonstrate that the Local Plan has any significant popular support. The previous, failed and rejected effort attracted many more complaints than supporting messages, and GBC have made minimal attempt at community engagement. Basic publicity and events have kept it low profile, meaning many people have either not heard of it or don't know much about it. While GBC may claim otherwise, any cursory view on the communications strategy is damning and seems to show a clear attempt to minimise any potential feedback. The fact the documentation is so long, written in complex language and hard to read formatting adds to the difficult in responding.

Further, the plan documentation and process has built on that approach. Incredibly long documents, poor formatting, hard to read font and a difficult response process has been designed to make it hard to provide constructive feedback. GBC have an established process for ensuring that it is easy to reject negative feedback on planning matters, and the Local Plan is a clear continuation of that.

The stunning lack of strategic planning is painful. At its most basic, any plan of this scale must include essential infrastructure improvements. And yet GBC plan to allow the start of building of thousands of houses at Gosden Hill before the planning for the proposed A3 tunnel...which would start at the same place. With no upgrade in roads (or clearly impossible developments, such as Sustainable Movement Corridor through Burpham), the tunnel becomes essential for the future of Guildford, and to avoid Burpham becoming a car park. Yet the plan hopes to start building, before a decision has been reached on the tunnel. In any commercial enterprise, such a staggering lack of forethought would result in instant rejection. The same criteria should be applied here.

The previous Draft Local Plan was delayed and re-written, yet nothing has changed sufficiently to change that decision.

A number of other local bodies, including the Burpham Community Association, Burpham Neighbourhood Forum and Guildford Residents Association will all submit their objections with significant technical details and research that condemns the plans, so I will not duplicate those efforts.

However, the plan is so transparently flawed in serious ways that are fundamental, meaning it should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11825</th>
<th>Respondent: 10863969 / Joanne Rooke</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>These are too much development in Wisley (A35) Ripley/SEND (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5018</th>
<th>Respondent: 10864353 / Eildert Jan Panman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I believe that the Draft Local Plan is built on an inaccurate assumption of the number of homes required. The SHMA has arrived at the number 693 without the methodology being made transparent. Recent work by Councillor David Reeve and another independent source has found serious fault with the SHMA which throws in doubt the whole draft local plan's calculations. I believe that GBC has gone along with the very large number because it is bent on its own aggressive policy of civic and economic expansion, which is not supported by the majority of the electorate. Therefore, I <strong>object to Policy S2.</strong></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5023</th>
<th>Respondent: 10864353 / Eildert Jan Panman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I object to this draft local plan because the proposed number of homes is too big, predominantly on Green Belt land and not on the available brownfield sites, and Guildford Borough Council, despite saying they are listening to the electorate, have just rehashed the old local plan with even bigger housing numbers and greater destruction of the Green Belt.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1598</th>
<th>Respondent: 10865537 / Edwina Fassom</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td><strong>Attached documents:</strong></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1. I OBJECT to the Borough Wide Strategy (Policy S2)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon &amp; Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6.1 OBJECT to the enormous and disproportionate volume of proposed development in this small area of Guildford Borough, which will impact negatively on local roads, services and air quality, reducing the quality of life considerably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1234</th>
<th>Respondent: 10866305 / Christine Reeves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7) I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10907</th>
<th>Respondent: 10866721 / Andy Court</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Disproportionate size of sites in relation to rural locations
I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

Unbalanced allocation of development in one area of the Borough
Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10914</th>
<th>Respondent: 10866721 / Andy Court</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Overdevelopment of sites

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4099</th>
<th>Respondent: 10866945 / Kristine Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13455</th>
<th>Respondent: 10867009 / Paul Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. Please confirm this letter has been received.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13096</th>
<th>Respondent: 10867105 / Steve Loosley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/13097  **Respondent:** 10867105 / Steve Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

16. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7808  **Respondent:** 10868097 / Andrew Donnelly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Brownfield opportunities are being ignored, transport evidence is not yet fit for use and major transport issues are unresolved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/991  **Respondent:** 10868609 / Robert Lockie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
1. I object to the disproportionate amount of development in one area of the Borough
2. I object to the limited consultation period.
3. I object to the last minute inclusion of new sites with less than two weeks notice.
4. I also object because this plan is simply not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11682</th>
<th>Respondent: 10868609 / Robert Lockie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development that GBC has proposed for Send and the surrounding area. Apart from the main road through Send, the rest of the village is very rural with single track country lanes, where it is already dangerous as there are virtually no footpaths in Send and traffic can speed along these lanes, particularly when the numerous traffic hold ups occur along the A3 and the village is used as a cut through (this also applies to Ripley)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11693</th>
<th>Respondent: 10868609 / Robert Lockie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the overload of development in Send as 50% of the borough’s proposed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/78</th>
<th>Respondent: 10869025 / E.J. Bartlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
• I object to development in this area when there are clearly no services or infrastructure to support more housing.
• I object to development which causes more traffic on already over-loaded roads. The A3 and M25 are frequently at capacity already. Building at Wisley Airfield and at Garlick's Arch will result in far more cars on the roads as there are no railway stations at these locations and rural bus services have been reduced.
• I object to development which causes more traffic on small country roads. The narrow country roads around Ripley, Clandon and Wisley are places for walkers, cyclists and horse riders. They are becoming increasingly congested and therefore dangerous for these users.
• I object to development which will cause more traffic in small villages such as Wisley, Clandon and Ripley. Parking is already difficult in these places and will only get worse if there is more development.
• I object to more development which will reduce people's quality of life in terms of pollution, congestion on roads, difficulty parking and increased density of population.

We all need space; unless we have it we cannot reach that sense of quiet in which whispers of better things come to us gently. Our lives in London are over-crowded, over-excited, over-strained. This is true of all classes; we all want quiet; we all want beauty for the refreshment of our souls. Sometimes we think of it as a luxury, but when God made the world, He made it very beautiful, and meant that we should live amongst its beauties, and that they should speak peace to us in our daily lives.

Octavia Hill (National Trust founder)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• There is insufficient public transport for the existing population, an increase of circa 7,000 houses with an associated number of cars is completely unrealistic for the local road network to which I object.
• I object to the lack of evidence for the alleged housing need numbers.
• The proposal to construct a large number of houses in a small area is unjustified and disproportionate and I object.
• With more evidence daily of the effects of road traffic on public health I object to the proposed large increase in vehicle numbers.
• I object to the large population increase such developments will bring without provision for more policing.
• Welfare services are currently overstretched, the population increase will make these services impossible to deliver.
• I object to the absence of protection to heritage sites.
• I object to the absence of protection to the environment.
• There has been insufficient consideration of SPA, SSI and Conservation Area issues to which I object.
• Cycling is hugely popular on local roads, there is a lack of proper cycle lanes on local roads. The proposes development and traffic increase with no inclusion of cycle lanes poses a real danger to cyclists to which I object.
• The above is true of footpaths to which I also object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9781  Respondent: 10871329 / Lyn Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Building new homes on urban brown field sites, or within the villages’ envelope must be the first recourse to providing the homes for young people and families who wish to stay in the area, or for people who want to move here for their work, or to escape urban sprawl

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6543  Respondent: 10872577 / Carol Finlayson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Plan for West and East Horsley

I write yet again to express my grave concerns at the local plan which has been put forward by the Guildford Borough Council. Especially in the proposed removal of East and West Horsley for the Green Belt area and the extension of the boundaries of the settlement areas of the Horsleys.
Overall I understand that there is a need in the borough for new homes and do not oppose development providing it is in keeping, in proportion and does not fundamentally change the character of the area. However the current plan for East and West Horsley is neither in proportion or character to the local area.

Surely it would be much better to focus the development in Guildford which already has good infrastructure and amenities? The brownfield areas of Guildford should be utilised first, where high density building fits and would be desirable. Expanding the boundaries of Guildford, where people have elected to live in a town, would not fundamentally change the character of the area. This could then be supplemented by smaller developments spread out throughout the villages of Guildford Borough, which would not have the detrimental effect that the proposed large developments in Horsley and Ockham would have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
To even consider the development scale being suggested and to remove villages from the Greenbelt to achieve it is beyond disgraceful. Represent the residents and stop cow towing to central governments ridiculous quest for housing numbers without considering the impact and long term consequence for the green areas for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9514  Respondent: 10873377 / Rebecca Howard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am deeply concerned by Guildford Borough Council's latest Draft Local Plan and object to the housing development proposals detailed in it.

It is simply astonishing that the Council is considering building new housing in the Green Belt when there is so much unused brown field land in the Borough that could be used for housing. There are no "exceptional circumstances" to justify changes to the Green Belt and I can only assume that recommendations to do so are being determined by developers preferences in terms of where they can make the most profit.

What is more unsettling is the revelation that the Council is unwilling to release the evidence base it has used to justify the need for 14,000 new houses in the Borough. Surely if the Council was confident in the accuracy of its proposed housing figure it would have the courage and conviction to release the information. Not to do so simply fuels an understandable suspicion that the 14,000 figure cannot be justified. Furthermore, I understand that the reason given by the Council for not releasing this information is that it is the "intellectual property of a third party and is commercially sensitive". This is ridiculous. Are we really expected to believe that this third party, GL Hearn I believe, whom the Council has engaged owns the evidence and whatever models have been produced to derive the 14,000 figure? If this is true then whichever Council employee agreed to this has made a monumental procurement "cock-up".

I am also aware that whoever is, or has been leading this work for the Council, does not appear to have applied the new planning framework correctly. Neither have they sought to align this Plan with the guidance received from Ministers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9532  Respondent: 10873377 / Rebecca Howard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I trust that my views will be fully considered and that the Council will have the maturity and common sense to revise the current Plan and ensure that the next version is based on sound, freely available evidence and fully incorporates the feedback of the Borough's constituents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13659</th>
<th>Respondent: 10874273 / Margaret Pearce</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Guildford Draft local plan. In particular I object to 1) policy S2 (Borough wide strategy) the number used for needed houses is too high and based on a secret formula.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7114</th>
<th>Respondent: 10875969 / Valerie Austin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate allocation of housing in this particular part of the Borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14522</th>
<th>Respondent: 10876033 / Lucie Paulson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to policy s2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- no justification given for number of new houses needed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- no strategic Surrey wide overview of housing needs - people don't stop living and working at borough boundaries</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/2715</td>
<td>Respondent: 10876321 / J Montgomery</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>--------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the amount of planning for new builds in the Ockham, Ripley and Horsley area.

Ripley has already built many new properties from flats, to larger houses and this should be included in the quotes. However, 400 new at Burnt Common and more in Send will mean Ripley Village becoming nearly a town. In filling between villages was to be prevented by the Green Belt, we should not be altering laws.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17259</th>
<th>Respondent: 10876897 / Norman and Morag Evans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

IN CONCLUSION

The 2016 Plan is completely unacceptable. The Council has totally ignored the comments and suggestions of residents and proceeded with an outrageous assault on the Green Belt for which they have absolutely no mandate - in fact, the very opposite. The housing target is excessive and needs to be seriously reviewed, especially in light of Brexit, and a new plan needs to emerge based on actual housing needs with the right kind of accommodation in the right places, and a plan that requires the least amount of infrastructure developments. If the current Plan proceeds, it will lead to massively increased traffic congestion and pollution levels, require a huge amount of public expenditure, and destroy the character and beauty of an attractive and much-loved area.

Above all, we need a Plan that supports local needs and not the balance sheets of developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12041</th>
<th>Respondent: 10876993 / Michael Hurdle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough wide strategy

I object – The calculation that 13,860 homes are required is based on a calculation made by a sub-contractor who will not share the basis of the calculation, citing commercial confidentiality. Wrong in principle – government should be open and transparent; important data should be open to give public confidence that it is accurate, based on sound assumptions, and free of commercial bias.

SHMA Accuracy doubtful - In Dec 2014, the House of Commons and Local Gov. C'tee was critical of the accuracy of SHMA processes, noting (section 69) that repeat calculations of an area could yield different results.

The method of calculating the population of a town with many foreign students also distorts the population total.

ELNA - The Employment Land Needs Assessment 2015 indicates that Guildford does not need a large increase in employment space, which suggests that such housing as is needed could largely be built on Brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1012  Respondent: 10876993 / Michael Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 Planning for the Borough

I OBJECT to the new target of 12,426 homes as there have been no constraints applied as required by the NPPF, especially the need to demonstrate ‘exceptional circumstances’ for building in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Apply appropriate constraints.

Attached documents:

Comment ID: PSLPP16/13672  Respondent: 10877153 / Carol Ann Cullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I do not agree that the extensive developments at Burnt Common, Gosden Hill Farm and Burpham are necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13335  Respondent: 10877249 / Ann Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The number of homes that the Plan intends to deliver and the geographical imbalance of the proposed developments
2. The enclosure of protected Green Belt within the proposed new village boundaries (for which there will be a presumption for development in the future).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3695  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Why have you not made more of development of existing brownfield sites instead of developing greenbelt sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3705  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5. Roads Must Be Maintained

The roads in Ockham, East & West Horsley are very poorly maintained with pot holes everywhere. Until something as basic as this can be sorted out, how can we trust that the roads will be maintained with the increased traffic from all the extra proposed housing.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/8366  **Respondent:** 10878081 / Linda June Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. The number of houses that the Plan intends to deliver over the 20 year period

This has increased from 652 to 693 and should have taken into account the constraints which should have been put in place by the high proportion of the borough's designated Green Belt and the overall infrastructure of roads, schools, hospitals, doctors, etc.

1. The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt.

The boundaries should be more closely drawn to the villages to prevent urban sprawl and prevent the losing their identities. The land within these proposed boundaries would encourage further over-development and expansion of the villages. Rural identities would be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/5083  **Respondent:** 10878433 / John Townsend  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. Young people want to live in towns close to work and transport - build in Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposed Submission Local Plan

I have reviewed the Proposed Submission Local Plan published by Guildford Borough Council (GBC) for public consultation and am dismayed by some important aspects of its content.

In particular:

1. I do not agree with the scale of the proposed house building programme. The target shown represents a 25% increase in the Borough housing stock. However, the Office of National Statistics projects merely a 15% population increase for Guildford Borough over the same period.

Therefore I object to the Borough housing targets set out.

1. The Local Plan incorporates the statement "We will continue to protect the Metropolitan Green Belt". However, GBC would seem to be in breach of this aim through the housing policies it has set out in the Local Plan, in which 65% of the developments will be made on land that is currently Green. This includes the proposal to inset East Horsley from the Green Belt; propose boundary changes and the proposal to remove Wisley Airfield from the Green Belt.

Consequently, I object to the proposed intrusions into the Green Belt, which will have a material adverse impact on the area.

1. The infrastructure proposals appear inadequate to meet existing and current needs, let alone those of the area after the additional proposed developments in the local Plan.

Therefore, I object to the proposed infrastructure proposals.

5. Consequently, in summary, I object to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoore, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (dandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6530 **Respondent:** 10879457 / Louisa Scott **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford plan which has not identified sufficient brownfield sites within the urban area and includes 70% of the proposed housing of 13860 targeted in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to what seems to be disproportionate disguise of development in my area of the borough. I also do not believe existing brown fields sites are being considered properly.

I object to very limited period of consultation. We are being treated with contempt in this.

I object to the decidedly last minute inclusion of new sites with than two weeks notice. This is not proper.

GBC has a clear need to take care of the interests of the residents not just of today but also future generations. The Surrey that I know and love and have lived in for nearly 40 years will be destroyed by there ill thought out plans. I urged it to face up to the fact that it has got it badly wrong.

Can GBC really claim to represent residents?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the decidedly last minute inclusion of new sites with than two weeks notice. This is not proper.

GBC has a clear need to take care of the interests of the residents not just of today but also future generations. The Surrey that I know and love and have lived in for nearly 40 years will be destroyed by there ill thought out plans. I urged it to face up to the fact that it has got it badly wrong.

Can GBC really claim to represent residents?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1580  Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

In terms of the requirement for housing, I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. and the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1628  Respondent: 10882785 / Stephen Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

28. I object to the allocation of sites in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18197  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s ‘need’. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon and Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1094</th>
<th>Respondent: 10883841 / Gillian Millership</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am concerned with the scale of house building being proposed by GBC. The local plan target proposes a 25% increase in housing stock whereas the ONS projects a need for only an increase of 15% for Guildford Borough. Much of this new housing development is at the expense of the metropolitan green belt. Once it is built on it will be lost for future generations. Your Proposed Submission states that “We will continue to protect the Metropolitan Green Belt”, however some 65% of developments will be made on land that is currently green belt. How do you explain this contradiction? I therefore object to the Proposed Submission Local Plan.

In particular I would like to comment on the following Strategic Policies

I object to S2 GBC is pursuing a policy of Forced Growth with 65% of new developments on land that is currently green belt. The electorate have not been made aware of this policy. It is not government statistics driving the huge number of new houses to be built, rather it is a deliberate GBC policy.

I hope that GBC will not force through a Local Plan that does not have the support of its residents. I object to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14051</th>
<th>Respondent: 10884897 / Eric Voller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed provision of 2000 houses plus travellers sites and Car Park at Gosden Hill Farm (Burpham-West Clandon) and to 2000 houses being built at Wisley in the plan (Wisley application has already been turned down, but remains in the Plan) Both of these schemes together will produce thousands of more cars on already congested roads. These schemes, will both especially effect BURPHAM, which is already grid locked daily. This will also increase pollution. These additional 4000 houses will overstretch doctors surgeries, hospitals, schools and the whole infrastructure of Guildford.

I object to the proposed use of Brownfield sites for the use of business and shops. Brownfield sites should be used for housing. (Affordable housing preferably)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4276</th>
<th>Respondent: 10884929 / Kim Mackenzie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I have previously written on two or more occasions regarding the various drafts of the Guildford Local Plan, specifically how it affects East and West Horsley, my home villages. On studying the latest Plan,

I FIND I MUST WRITE YET AGAIN.

It does appear no notice has been taken of so many reasonable and logical complaints that have been sent to you in the last 2 years.

I have been lucky to live in East Horsley for over 30 years, and have served the villages for 15 years driving and managing the Horsleys Community Bus. I mention this as this has been a great way to get a feeling for what residents need and want and think. The people concerned cover all works of life, many of them more needing local support. In essence we live in a large village area, almost a small town, but which retains its village character but the efforts and hard work of so many residents, mainly on a voluntary basis. We care about our village, and want its character to remain. There is no evidence the amount of new housing is needed in the area, and well exceed the nationally imposed target levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1096  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
4. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing
being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7654  Respondent: 10885633 / Catherine Jackson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6841  Respondent: 10889985 / Ruth Macdonald  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Borough Wide Strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall Housing Figure, which would be more reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing Number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
2. The Housing Number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West. All of these lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so, therefore, are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites of over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6251  Respondent: 10892353 / Robert Wilson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The primary thought regarding development must be that this area is our only remaining one close to London where urban dwellers can come to enjoy a day in the country. This area in the last few years has already become grossly overpopulated with the result that is my opinion.

No more countryside in the Guildford area should be built on at all.

I live in Shere which I have seen double in size in the last half century

It is up to you to keep what remains of our unique landscape for the future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15502  Respondent: 10894817 / Stephanie Woodford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The primary thought regarding development must be that this area is our only remaining one close to London where urban dwellers can come to enjoy a day in the country. This area in the last few years has already become grossly overpopulated with the result that is my opinion.

No more countryside in the Guildford area should be built on at all.

I live in Shere which I have seen double in size in the last half century

It is up to you to keep what remains of our unique landscape for the future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all proposals to build on the Green Belt at Send, Ripley, Send Marsh, Clandon and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. None of these areas have a decent bus service and therefore new homes will rely upon cars for transport adding to existing congestion.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7110  Respondent: 10896065 / Georgia Bean  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed development plan is disproportionate to the size of the villages and is an over kill. It is directly out of proportion to the size and availability of brown field sites already available for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/14972  Respondent: 10897953 / Janice Hughes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

DISPROPORTIONATE DEVELOPMENT

There would seem to be a disproportionate amount of development proposed in our area of the Borough. The proposals seem to concentrate on a relatively small area & will have a very significant impact on the villages of Send & Ripley in particular. I object to this disproportionate concentration of development in our local area.

LIMITED CONSULTATION PERIOD

I understand that there has been a very limited consultation period and that new sites were only added to the proposed revised Draft local Plan at the last minute. This would seem unfair and I object to residents being treated this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
DEVELOPMENT GENERALLY

I am not totally against new development. However the amount of proposed development to our local area is inappropriate and I do not believe it is justified. I object to the removal of such significant areas from the Green Belt. If the proposal were scaled down, then I would be more likely not to object so strongly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12239  Respondent: 10898145 / Louise French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to various sites being taken out of the green belt. There is a lot of brownfield land which could be used but we all know that the developers like nice clean green fields for their developments and do not like brownfield sites because they are more difficult (ie more expensive) to build on

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3405  Respondent: 10898625 / James Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8620</th>
<th>Respondent:</th>
<th>10900257 / Mark Norman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td><strong>Over development in one area</strong></td>
<td>How can it be conceived as acceptable that 2000 homes be built in Burpham which grows a village by nearly double.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2895</th>
<th>Respondent:</th>
<th>10900385 / Michael Mills</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td><strong>I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.</strong></td>
<td><strong>I strongly object to the limited consultation period.</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2920</th>
<th>Respondent:</th>
<th>10900641 / E.J. Mills</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.

I strongly object to the limited consultation period.

I strongly object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17073  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The extensive developments proposed in other areas of the borough eg in Burpham (2000 houses & mixed use developments), Burnt Common, Gosden Hill Farm and Garlicks Arch to name a few. If all these developments are implemented, the character of the area will be changed forever. It will no longer be semi-rural but will become increasingly urbanised and will begin to resemble a concrete jungle. The majority of the people who live here have moved here because they do not want to live in an urban conglomeration. If this mass housing expansion goes ahead, the wishes of the majority of the existing local population will have been ignored so much for democracy! It is also completely scandalous that the proposed development at Garlicks Arch was "sneaked in" at the last minute. Please respect the wishes of the local people. We all understand that some limited housing development is needed but not these huge numbers proposed and this development should be undertaken on brownfield sites of which there are still plenty in Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4124  Respondent: 10904865 / Michael W.R. Herwig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Think again Guildford. You don't seem to be aware of what happens in the Send area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3397  Respondent: 10905825 / Bridgette Hampton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9143  Respondent: 10906145 / Joe Gervasio  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [site A35], Ripley/Send [site A43] and Gosden Hill/Clandon [site A25]). 36% of all the Plan’s new housing is proposed in these three wards, which have only 11% of the existing housing – this is disproportionate by over 300%

Over 5000 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

EHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

EHPC finds this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of EHPC’s particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, EHPC doubts whether this is actually the case. It is certainly not a vision that is shared by EHPC, which unequivocally rejects GBC’s Forced Growth policy.

**EHPC accordingly OBJECTS to the borough housing targets set out in Policy S2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/12730 | Respondent:  | 10910625 / Alyson Blackwell | Agent: |
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In response to the Consultation, I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by the residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/12151 | Respondent:  | 10910753 / Heather Thompson | Agent: |
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. It seems that these villages are to be sacrificed so that the council can fulfil its questionable target.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. This sort of development is in direct contradiction to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17855  Respondent: 10910785 / Clare Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The Site Allocations list totals 12,698.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1970  Respondent: 10911201 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11116  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15508</th>
<th>Respondent:</th>
<th>10911425 / Andrew Gray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14032</th>
<th>Respondent:</th>
<th>10912513 / Sarah Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/14034  Respondent: 10912513 / Sarah Green  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

1. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.
   2. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/16138  Respondent: 10912513 / Sarah Green  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: PSLPP16/16142  Respondent: 10912513 / Sarah Green  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2327</th>
<th>Respondent: 10912705 / Tim Williams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the allocation of sites in unsustainable locations.</td>
<td>I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3984</th>
<th>Respondent: 10913377 / Isabelle Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>The planned provision of 13860 new homes is in excess of the 10395 homes published in the Annual Housing Target table by 33%. This discrepancy is not explained in the documentation, represents an unjustified over-provision and is not sound.</td>
<td>From the SA report &quot;Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas&quot;. Without evidence of co-ordination with other regions, it is difficult to see how this document complies with the Duty to Cooperate. Inflating Guildford Borough's OAN to meet an assumed unmet housing need in Woking and Waverley may be noble, but is unjustified without formal cooperation.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/3991</td>
<td>Respondent: 10913377 / Isabelle Stevens</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object because these housing developments and the proposed changes would change the nature of this beautiful area forever devaluing it for my generation and beyond. I believe that our villages are being dumped on in that we are being asked to accept a staggeringly high number of Guildford’s housing needs. Lastly, I do not feel that this need is evenly shared throughout the Borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7205</th>
<th>Respondent: 10915361 / Judy Young</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>POLICY S2 – Borough Wide Strategy</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to this policy on the basis that there is no substantiated evidence for the need for the scale of the development being recommended</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16081</th>
<th>Respondent: 10915905 / David Anness</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The objections above demonstrate a democratic deficit between the views of the local population and the unjustified scale of development in the Proposed Plan which places no value on existing amenity (i.e. Green Belt) and contains no practical plans for infrastructure enhancement.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: PSLPP16/789  Respondent: 10916193 / Ann and David Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The housing targets for the whole of the Guildford Borough area are over the top and unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11158  Respondent: 10916417 / M.C and K.G Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the huge number of houses planned for the Horsley area on the grounds that the infrastructure, particularly the roads, simply won't be able to cope with the extra traffic. Ockham Road South, one of the main arteries, is narrow and winding with no scope for improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11159  Respondent: 10916417 / M.C and K.G Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the sheer number of houses planned for this mostly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8121</th>
<th>Respondent: 10917537 / Elin Keyser</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The ‘plan’ does nothing to assure me that a cohesive and holistic approach to providing more housing in Surrey is being thought about. It seems fragmented and slightly desperate in its desire to place people in what must appear to planners to be ‘free’ space. That it is not.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16182</th>
<th>Respondent: 10917985 / Alan Stephenson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Their is a disproportionate level of development in and around the Burpham area of the Borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6727</th>
<th>Respondent: 10918305 / Susan Butler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Disproportioned number of new houses for local facilities:</strong> I <em>strongly object</em> to the number of new houses proposed within the Horsleys and surrounding villages namely Ripley, Send and Clandon. Within the Horsleys, the schools, doctors and train stations are struggling to cope with the current demand. My family commute to London from Horsley and the trains and car parking are almost at maximum capacity. Assuming that every new house has at least two cars, this means potentially 6000 more cars within a three mile radius of the villages. The impact on the local roads will be tremendous. Parking at Horsley &amp; Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will be affected.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed development plan is disproportionate to the size of the villages and is an over kill. It is directly out of proportion to the size and availability of brown field sites already available for development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I sincerely hope you, the council, will consider my objections and avoid destroying the Borough’s Green Belt which is precious and I fear for its demise. Our British countryside needs to be protected for future generations of population, animal, bird and plant life. Please protect our environment from increased pollution and flooding</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Comment ID: PSLPP16/8292  **Respondent:** 10918657 / Angus MacDonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/686  **Respondent:** 10919105 / Susan Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to. The proposed disproportionate amount of development in one area of the Borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/8093  **Respondent:** 10919841 / J.A. Millard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
General. Ultimately, all the above extravagant developments are for the benefit of outsiders and not the local community. Guildford Borough Council is reacting to the demands of forces outside the communities it is meant to be serving. In doing so it is even going against the stated commitment of central government to protect the Green Belt. The consequent massive negative impact on local residents is being ignored. Guildford Borough Council should concentrate on satisfying the genuine needs of the borough's population through much smaller scale and more spread out developments in sympathy with the local environment. It should be serving those who ultimately elect them to office. Developments should not be disproportionately impacting on one area of the borough. Surrey already bears the scars of much thoughtless and unnecessary development. Continued proceedings along these lines will result in the local population ensuring that only those councillors and parties who are sympathetic to local needs are elected in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10101  Respondent: 10920001 / Jeff Doyle  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12864  Respondent: 10920065 / Roz Tacon  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Further to the EHPC letter of objection (of June), we agree and endorse the reasons for objection raised in their response. It is our view also that:

We have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, we do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14764</th>
<th>Respondent: 10920129 / Steven Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Borough Wide Strategy OBJECT. I object to the large scale of the proposed building programme - a net increase of 25% in the housing market of the Borough. That is greater than any population growth forecasts.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12478</th>
<th>Respondent: 10920801 / Andrew Roach</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>The level of vandalism proposed by the local plan is unacceptable and must be stopped and elected representatives need to serve those who elected them.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16104</th>
<th>Respondent: 10920865 / Sebastian Forbes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Why so many more houses here in Surrey, which is England's most densely populated county?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4917</th>
<th>Respondent: 10920961 / Mark Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
It seems to me that GBC is determined to target Send as a site for development. It is palpably not suited to such plans as anyone who is prepared to visit the village at rush hour would witness. Send is a pleasant village to those who currently live there but with its amenities are already stretched as its stands (transport, doctors surgery and schools). As residents of Send we are equally determined to stand fast in our objection to ill-considered further development and strive to protect the area we call home. It has a rich heritage, its Green Belt status has attracted a loyal following who have paid a premium to retain its beauty. We will continue to do so.

Finally, could you please confirm receipt of my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [IMAGE 1.jpg](1.1 MB) [IMAGE 2.jpg](953 KB)
I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6284  Respondent: 10921921 / V Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16523  Respondent: 10921921 / V Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12068  Respondent: 10922177 / Paul Knight  Agent:
**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Firstly I would like to say thank you to the team who visited East Horsley Village Hall to present the plan. Tough job give the size of the plan document, scale of the development and the flawed nature of the plan. I also understand that the pressure on development in a county that has such a large proportion of protected areas provides many challenges. Having said that it soon came clear that the team were not able to answer questions to an adequate level and just started repeating that you should write formally with any objections. As such this is exactly what I am doing.

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write with grave concerns about the proposed eroding of the green belt. The unrealistic quantity of houses which would swamp the whole infrastructure of the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13129</th>
<th>Respondent: 10924609 / H Perryman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the borough-wide strategy of the Local Plan because it is poorly considered. The strategy calls for nearly 14,000 houses across the borough of which a completely disproportionate number (more than a third) will be in the rural wards of Lovelace, Send and Clandon and Horsley. This will have a permanent detrimental effect on all the communities in these wards. The existing small communities will be merged into an urban sprawl.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7852</th>
<th>Respondent: 10924769 / Christy Dadswell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1669</th>
<th>Respondent: 10924897 / Louis Botha</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy S2:

I object to the exaggerated housing need figure in the West Surrey Strategic Housing Market Assessment on which the Draft Local Plan is based. The Council has declined to provide any objective evidence to substantiate the projected housing numbers, which in my view is far in excess of reality. In particular I believe the calculation of foreign students has been wrongly used to inflate the housing need.

Furthermore, the housing number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

I object to the fact that the impact on infrastructure has not been considered sufficiently. Current infrastructure is utterly inadequate to deal with proposed new housing levels. Roads, doctors and schools will be unable to cope. Yet no tangible resolution has been proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/227  Respondent: 10925025 / Theresa Roads  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/229  Respondent: 10925025 / Theresa Roads  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to further large developments due to the greater levels of air pollution that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8112  Respondent: 10925729 / Diana Johnson-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16083  Respondent: 10927841 / Frank Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that this inflated final target housing number results in:- • up to a 35% increase in the number of households in West Horsley. • up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield. The infrastructure of the Horsleys as outlined above cannot support this expansion. In addition, 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/451  Respondent: 10928097 / Tina Foulkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- we all know, we need some new housing. But a disproportionate housing increase of 2x what is there currently is irresponsible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6675  Respondent: 10928513 / Lorraine Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

-
The local plan is not sustainable and I object to the late inclusion of A43 Garlicks Arch, the proposed Wisley Airfield which will put untold strain on local roads. The development is disproportionate in one borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8641  Respondent: 10928577 / Johan Stalmans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In summary, the proposed plan for the area is completely inappropriate, unsustainable and damaging to the environment.

I urge Guildford Borough Council to reconsider and formulate a more reasonable plan, limiting to a few dozen houses, in keeping with the local architecture and density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8966  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however,
does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3819  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to a number of issues within the Plan as follows:

The Plan appears to state a need for over 7000 new homes to be built within the Borough. I cannot believe that Guildford is due to receive such a disproportionate increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3661  Respondent: 10928897 / Patricia Farmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan appears to state a need for over 7000 new homes to be built within the Borough. I cannot believe that Guildford is due to receive such a disproportionate amount of development in one area of the Borough.

I object to the apparent last minute inclusion of new development sites, obviously intended to create even more confusion and uncertainty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10237  Respondent: 10930081 / Helen Court  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open nature of the borough and produce gridlock on the A3 and surrounding roads - including the A247 which are already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10239  Respondent: 10930081 / Helen Court  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I object to the addition of more cars on our already congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4094  Respondent: 10930305 / M.S. Hollins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I OBJECT to the enlargement of the village area of Send, Send Marsh and Burnt Common. I have lived in Send for over 60 years and have seen the village increase in size without any increase in school places or size of the doctor's surgery. We only have ONE surgery to cover the whole area and yet you want to add a further 500+ families.

I think that Guildford's plan is no use to local residents,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15262  Respondent: 10930945 / Peter Perry  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. Even with the overall figure being reduced, the Plan should be more balanced across the borough.

It is unacceptable to build 5,036 houses between the M25 and Burpham (about 5 miles) that will obviously lead to a merging urbanisation of identities of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10801  Respondent: 10932801 / Angela Grenham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Local Plan proposes 13,860 new homes to be built across the borough by 2031. This figure is said to be based on an objective SHMA carried out by GL Hearn, consultants whose website openly states their pro-development agenda. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it, despite repeated requests for debate. The assumptions and calculations underlying the model have not been disclosed, protected by a claim to intellectual property. The Council say we should ‘trust the contractors’ model because it is used by a large number of other local authorities’, however this is no guarantee of objectivity. Indeed, at least two recent papers have been published (one by Guildford Greenbelt Group Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association), which challenge the findings of the SHMA.
Furthermore, the housing number is based on projections for economic and population growth pre-Brexit, including migration. These projections now need to be revised downwards, possibly quite significantly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1701  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 - Borough Wide Strategy

I OBJECT . I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously."4

1. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers

"1 NPPF paragraph

"2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: " Development that meets the needs of the resent without compromising the ability of future generations to meet their own needs."

"3 Including: " empowering local people to shape their surroundings ... Take account of the different roles and character of different areas... protecting the Green Belts around them ... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future ... Contribute to conserving and enhancing the natural environment and reducing pollution ... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets ... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable ."

"4 At the time of writing, about £8billion (40%) has been wiped off the value of the UK's top 4 housebuilders alone .
derived from it are unreliable. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.5 The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

1. The status of the 13,860 figure is The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is irrational to embark on a radical transformation of the borough without a clear Housing Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1673  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY S2 -Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.  

2. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers

"1 NPPF paragraph 14.

"2The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: " Development that meets the needs of the resent without compromising the ability of future generations to meet their own needs."

"3 Including: " empowering local people to shape their surroundings ... Take account of the different roles and character of different areas... protecting the Green Belts around them ... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future ... Contribute to conserving and enhancing the natural environment and reducing pollution ... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets ... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable ."

"4 At the time of writing , about £8billion (40%) has been wiped off the value of the UK's top 4 housebuilders alone.

derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance}. This highly lopsided distribution is unexplained.

3. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.  

"5 The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity . Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the
NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is irrational to embark on a radical transformation of the borough without a clear Housing. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16453  Respondent: 10934689 / Adam Fox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15358  Respondent: 10935201 / Cathryn Walton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any
commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda leading to reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

4 At the time of writing, about £8 billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.
5 This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.
6 See http://www.glhearn.com/developer/Pages/Overview.aspx: “We act for many of the leading developers.” G L Hearn is now part of Capita Real Estate.
7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/893  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Council’s current Housing Target table sum whose figures to not equate, and who have not been transparent in disclosing the sources for these figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11865  Respondent: 10937025 / Louise McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to Send being removed from the Green Belt as a consequence of a "housing need" figure of 13,860. It has not been made clear to the public how this figure was calculated, but it would appear to be inflated, as a large proportion of this figure would comprise Surrey University students who would only be temporary residents of the Borough.

I OBJECT to the failure of Guildford Borough Council to identify sufficient brownfield sites within the urban area. This area should be targeted first for development, before Green Belt is considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14387  Respondent: 10938241 / Alan Brockbank  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the proposal to build 13,860 new homes. This is far too high and unsubstantiated. The suspicion is that consultants for developers have come up with this number and not councillors. The housing need has been grossly inflated.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites which should be targeted first for re-development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17935</th>
<th>Respondent: 10939201 / Dylan White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Guildford is a town surrounded by greenbelt, from various streets in the town you can see fields, it needs to be kept like this. Once that green is gone, it’s gone, we will end up with houses all the way to Woking which is not what people want. I notice all other Surrey areas have come in with much lower figures, why is Guildford so high?

Is it because GL Hearn have used flawed data to work out this very high need? Please explain how they came to make this calculation.

In summary, Guildford and the south east is full up. Guildford could not handle more than 60 houses a year let alone 600. But yes, lets have affordable flats and small houses in the town centre or on brownfield sites and lets get central government to invest in the north!! We have 1.7 million unemployed so lets get them working up north!!

Please send this draft plan back to the drawing board for the reasons given.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9609</th>
<th>Respondent: 10940673 / Carolyn Davis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). Will you please confirm receipt and show this letter to the Planning Inspector for his due consideration?

The following aspects of the plan do not appear to have been adequately considered or have been dismissed;

- The re-designation of Green Belt land for development - Green Belt Policy Guidelines (NPPG 79-83) sets out to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities all of which appear to have been ignored in the Send proposals.
I object to the Borough Wide Strategy (policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards in light of the Brexit decision. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey".

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has to date failed to revisit the data to validate that it is correct despite overwhelming concerns raised by borough residents. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need", Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and
local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44%AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done? The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.

Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13991  Respondent: 10941057 / Tim Green  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13994  Respondent: 10941057 / Tim Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16133  Respondent: 10941057 / Tim Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2745  Respondent: 10942081 / G J Teague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to record my strong objection to the draft Plan.

1. **Regulation 18 Consultation Statement**

Little account appears to have been taken of the concerns and objections raised in the most recent consultation in 2014. With regard to the multiple objections concerning the Horsleys, the Consultation Statement (p.163) states "These comments are considered to relate to the proposed sites .... and have been responded to in Planning for Sites." I am unable to find evidence of this response, or evidence of the specific objections raised in my letter of 19th September 2014 being included in the collated commentary (p.163 ff.)

In particular, no response at all appears to have been offered in the Consultation Statement to the central objection, namely, that under the National Planning Policy Framework (NPPF) exceptional circumstances have to be demonstrated to justify removal of Green Belt protection (para 83). The Consultative Statement does not comply with Regulation 18 of the 2012 Town and Country (Local Planning) Regulations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1384</th>
<th>Respondent: 10942081 / G J Teague</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy S2. This states 12,426 as the total required, yet the supporting table called up by the policy sums to 9,810. This is prima facie evidence of the unsoundness of the plan. More generally, no effort has been made in the changed SHMA properly to take into account the reduced housing need consequent upon UK government's declared long term policy of reducing immigration, and thus forecast new household formation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9723</th>
<th>Respondent: 10943265 / Barbara Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9262  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints...
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints...
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16472  Respondent: 10945057 / Margaret Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13719  Respondent: 10946177 / Graeme Verra  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

PROPOSED DEVELOPMENT AT OCKHAM
This would have a major adverse impact on the surrounding area putting additional strain on infrastructure and local facilities. One simple example being the A3 which now is at a standstill in the Ockham area at the times many people need to travel. The roads to local stations are similarly overloaded. There appears to be no serious consideration of the impact of such a major development on local infrastructure. The same detrimental impact would be felt on medical, school and other services. This and the proposed developments at Burnt Common and Gosden Hill, and Burpham must be rejected because of their wider impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/209  Respondent: 10949601 / Victoria Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **Unbalanced allocation of development in one area of the Borough**

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/6467  Respondent: 10949921 / Jan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/9617  Respondent: 10949985 / Charlotte Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

It is in the interests of any future decision to be made by the Planning Inspector that he fully appreciates the strength of opposition to the above.

It is all well and good for bureaucratic individuals, with no local knowledge of the full effect of decisions they may wish to make, to act contrary to the wishes of a majority of local residents when all they these ill advised bureaucrats have in mind is increasing the area of land available for development whilst ignoring amongst other matters:

1. Unacceptable escalation of traffic flow creating unwarranted air pollution.
2. Lack of availability of the necessary schooling facilities.
3. Stretching medical facilities already at breaking point.
4. The lack of local retail shop and other facilities to accommodate any resulting increase in the local population.

All in all the Council have failed miserably in adopting an objective approach to what is being proposed and even more than that have failed to demonstrate the exceptional circumstances which are surely necessary before the boundaries are extended for the purpose they have in mind.

It is time to look at the matter in the light of the year 2016 and in the light of the recent wishes of the majority of the electorate which has cast a doubt over the interest of builders in large residential development commensurate to this area of Surrey until the future becomes more stable within the housing market and if for no other reason the proposal should be shelved.
Please ensure these views are made available to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12513</th>
<th>Respondent: 10950273 / Stuart McDonald</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>• The Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys but these areas are small and would not benefit from more housing.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5611</th>
<th>Respondent: 10950561 / Jeanette Pell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.</td>
<td>Attached documents:</td>
<td></td>
</tr>
<tr>
<td>The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilities which would make a plan sustainable.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8188</th>
<th>Respondent: 10952129 / Nick Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I recognise that there will be some need for further housing but believe that there are still sufficient opportunities for this to take place on a manageable scale in West Horsley within the confines of the existing Green Belt. Land is such a limited resource in this country that we need to make more efficient use of already-developed areas before resorting to building over the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA.
I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.

The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley A irfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill
Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15787  Respondent: 10953249 / Charlotte Ladd  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website...
openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8848  Respondent: 10953793 / Hugh Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because
there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8810  Respondent: 10953921 / Alan Knox  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9247  Respondent: 10954209 / Anita Wilkinson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposal to build 13,860 new homes.
Comments: the council has strenuously resisted calls to demonstrate and provide support for these figures. In the absence of which, I can only conclude that there is no justification for them and that the pressure of developers have moulded these from the air and greedy dreams. In the light of recent political change I would suggest that a new set of figures might be indicated, perhaps reflecting real figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18306  Respondent: 10954849 / David Hayward  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Objection to the Guildford 2016 Local Plan

I OBJECT to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues listed below. I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon, West Clandon, Send Marsh, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are as follows:

I OBJECT to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years). I object on 3 grounds:

these housing numbers have been imposed with no real consultation being undertaken with residents; b. the housing numbers are based on a high-growth economic development plan which in itself has had no consultation and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London; c. no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years.

I OBJECT to the proposed scale of new building throughout the borough, which is disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18308  Respondent: 10954849 / David Hayward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13544  Respondent: 10955009 / David Kratt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of East Horsley for over 45 years and a householder for over 20, I wish to register my objection to the proposed local plan. There is simply no need to address the national housing shortage in the way that is being proposed for the Horsleys and certainly not in the way proposed by the development at Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only
deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exists, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15163  Respondent: 10957281 / Linda Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This policy has totally ignored the following key requirements from paragraph 17 of the NPPF:

- “take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them”
- “recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it” “contribute to conserving and enhancing the natural environment and reducing pollution”
- “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value”
- “conserve heritage assets in a manner appropriate to their significance“
- “actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable”. “empowering local people to shape their surroundings”

Removing West Horsley and other rural villages from the Green Belt by ‘insetting’ them, and expanding the boundaries of the settlement areas into neighbouring green fields (i.e. reducing the Green Belt) does NOT protect the Green Belt. Nor does it give adequate recognition to the intrinsic character and beauty of the countryside. Nor, by giving developers the option of building more cheaply on green fields does it encourage the effective use of land by reusing land that has been previously developed (brownfield land). By turning West Horsley into a rural town, it does not conserve the heritage assets of West Horsley. By encouraging 35% more houses in a rural village without intrinsic employment, rather than brownfield urban sites, it does not make fullest possible use of public transport, walking and cycling within the Borough. It is obvious from the degree of protest that there has been throughout Guildford Borough to the previous (2014) Draft Local Plan and the preceding ‘Issues and Options’ ‘consultation’ that local people wish to shape their surroundings in ways that are entirely different from that which is projected by the Draft Local Plan. The inconsistency between the draft Local Plan and the wishes of the local population is specifically the case for West Horsley Parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9152  Respondent: 10957857 / Adam Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to this policy and the way it has been formulated.

I note that the plan proposes almost 14,000 homes - 13,860 homes to be precise.

It appears as if this number has been plucked out of thin air. There has been no opportunity for any informed member of the public to scrutinise it. Nor has this number been scrutinised by councillors despite repeated requests for debate. Indeed, the Council’s scrutiny committee turned down the opportunity to scrutinise it on spurious grounds. From the outset the assumptions and calculations underlying the model are hidden contrary to all basic principles of research. It is completely unreasonable to use a set of unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It seems to me that for the Council to expect the public to believe these unsubstantiated figures is verging on the fraudulent. All attempts to secure the release of the underlying data have been resisted and should any aspects of this plan be scrutinised by a planning inspector, I hope that they will listen carefully to the transcript of the Council’s scrutiny committee, which I attended as an observer. It is my view that the Scrutiny Committee has let down the electorate.

It is completely inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself cannot be substantiated. Detailed criticisms of the model have been provided by external consultants and members of the public.

If the housing number were substantially lower, and was calculated only to meet housing need, then there would be no need to build on Green Belt land or in the open countryside.

The number of homes proposed, together with existing planning permission, added to expected “windfall” sites, exceeds 13,860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2408  Respondent: 10957857 / Adam Aaronson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (No ), is Legally Compliant? ( )

There are major flaws in the 2017 plan, not least of which is the housing target itself. I object to Policy S2.

Throughout the country, let alone in Guildford and its environs, there is astonishment at the manner in which GBC has steadfastly refused to examine, or permit others to examine the housing target of 12,246 and the basis upon which this has been reached. In the scrutiny committee a councillor stated “one does not have a dog and bark oneself” as a justification for not scrutinizing the GL Hearn figures. If a pharmaceutical company tried to licence and market a drug without making their scientific data available for scrutiny, they would not get approval from the licensing authority. In almost every research field it is part of normal analytical procedure to scrutinize the underlying data. Yet for some bizarre reason, GBC seems to think that it is not necessary to permit anybody to analyze the assumptions that underpin the SHMA. The only logical conclusion that one can draw is that the data must be flawed, because if it could stand up to scrutiny, it would have been released long ago. This flawed data means that the whole plan is fundamentally unsound and I object to it in the strongest terms.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7244  Respondent: 10958177 / Brian Cooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8248  Respondent: 10958337 / David Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In general, I do not understand GBC’s seeming desire for a small number of large development. If the focus was on a larger number of small developments, then overall effect would be much more sustainable and sensitive to the exiting communities within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or on any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17648  Respondent: 10958817 / Steve Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There are many suitable ‘brown field’ sites around Guildford that should be used and considered to meet our housing requirements. We need to consider other ideas of building above (over) car parks for student and affordable housing. Council planners need to move big retail parks more out of town and use these sites for housing i.e Lady mead retail park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My children are likely to work in London and want to live in town close to the station. There isn’t sufficient housing in the town. Instead we build large supermarkets, retail parks and encourage more cars into the town, these sites could have been used for housing.

- The area around the train station is poorly designed for cars and access to and from the station is crazy. This should be a priority for improvement!
- The main roundabout in the centre of Guildford and traffic around the roundabout which also effects the station and all spur roads into and out of Guildford is absolute crazy!
- The local plan should deal with this type of long term vision, development and strategic improvements not plastering over and digging up green fields!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8963  Respondent: 10959009 / Rebecca Claridge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18482  Respondent: 10959265 / Inger & Ron Ward  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1661  Respondent: 10959297 / Brian Benton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am objecting to the local plan as Guildford B.C. will not tell us how they arrived at the number of houses required. The traffic around Burpham is often chaos due to the past decisions of Guildford B.C. The plan for Gosden Hill will make the traffic significantly worse. Guildford B.C for whatever reason, seem to approve the most stupid major planning applications in spite of the objections of local people and when those objection are proved correct ignore their responsibility. GBC have proved their inability to make sensible judgements regarding the local plan. Listen to and accept the views of Burpham Community Association, they represent a much more realistic and reasonable view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1227  Respondent: 10959425 / Jan Lofthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. TINY RURAL OCKHAM
   I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7787  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and surrounding areas because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas which are much closer to existing transport lines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7788  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high. This results in the unnecessary development of the Green Belt. The way the number of possible people coming to the area and being able to afford housing has been overestimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10474  Respondent: 10960033 / Lucinda Kalupka  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justificati on to say that the tri-borough area
has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13883</th>
<th>Respondent: 10960257 / Craig Church</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>As the majority of Guildford borough is within the green belt, are the Governments figures for the number of houses that are required to be built reduced?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13539</th>
<th>Respondent: 10960353 / Trish White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12868  Respondent: 10961921 / Mark Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12278  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build
homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.
The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12295  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term
considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14390  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. However the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build on 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

I OBJECT to the Borough Wide Strategy (Policy S2)
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17751  Respondent: 10963233 / Susan Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Expansion should be constrained to protect the character of town and country in our congested gap town.

It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17756  Respondent: 10963233 / Susan Poole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/89  Respondent: 10964033 / Nicola Page  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to object most strongly to the local plan as follows:

1. A very large amount of proposed development in a comparatively small area
2. There will not be enough immediate school space in the existing schools.
3. The limited supply of doctors dental treatment and associated health care, which is all ready stretched to its limit.
4. The destruction of conservation areas, so much on the current government’s mind
5. The very limited, almost non-existent consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>I object to the Borough Wide Strategy (Policy S2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. The Plan places a disproportionate amount of development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). This will result in 36% of all the Plan’s new housing being in this area. 5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16942  Respondent: 10967489 / Jenny Jackson  Agent: |
|---------------|--------------------------------------------------|
| Document:     | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The inclusion of (temporary) students, economic need and local affordability are calculated in such a way as to inflate housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16944  Respondent: 10967489 / Jenny Jackson  Agent: |
|---------------|--------------------------------------------------|
| Document:     | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

8. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/2345  Respondent: 10969249 / Kim Taylor-Peat  Agent: |
|---------------|--------------------------------------------------|
| Document:     | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing to object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2346   Respondent: 10969249 / Kim Taylor-Peat   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1396   Respondent: 10969441 / Mark Woodman   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. There is a disproportionate level of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6357   Respondent: 10969601 / Jenny Paviour   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I feel that the exaggerated 'housing need' figure of 13,860 is far too high and result in the completely unnecessary development of the Green Belt.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6876  Respondent: 10970945 / Lee Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough, as by overdevelopment in conservation areas and on the green belt this could cause major floods as drainage could fail to cope with the onslaught of rain water during the winter months.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12925  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12943  Respondent: 10972065 / Sarah Cocke  Agent:
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Proposed Submission Local Plan

I have reviewed the Proposed Submission Local Plan published by Guildford Borough Council (GBC) for public consultation- and am dismayed by some important aspects of its content.

In particular:

1. I do not agree with the scale of the proposed house building programme. The target shown represents a 25% increase in the Borough housing stock. However, the Office of National Statistics projects merely a 15% population increase for Guildford Borough over the same period.

Therefore I object to the Borough housing targets set out.

1. The Local Plan incorporates the statement " We will continue to protect the Metropolitan Green Belt". However, GBC would seem to be in breach of this aim through the housing policies it has set out in the Local Plan, in which 65% of the developments will be made on land that is currently Green. This includes the proposal to inset East Horsley from the Green Belt; propose boundary changes and the proposal to remove Wisley Airfield from the Green Belt.

Consequently, I object to the proposed intrusions into the Green Belt, which will have a material adverse impact on the area.

1. The infrastructure proposals appear inadequate to meet existing and current needs, let alone those of the area after the additional proposed developments in the local PI

Therefore, I object to the proposed infrastructure proposals.

5. Consequently, in summary, I object to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4058  Respondent: 10984353 / Gemma Cole  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Local Plan 2016

My comments on the Local Plan as it affects West Horsley are as follows:

1. The building of up to 385 homes on 4 sites is unsustainable because the schools are full, there are insufficient shops with suitable parking, little public transport, and the car park at Horsley station is full every weekday. The Local Plan offers no concrete plans for the additional infrastructure and facilities which would be needed.

2. There are already drainage problems in the Ockham Road North & Green Lane areas. Thames Water has advised that the waste water system is unlikely to be able to support the demand anticipated from the proposed developments, and the foul drainage system from West Horsley to the treatment works north of Ripley would need to be upgraded to cope.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4061</th>
<th>Respondent: 10984353 / Gemma Cole</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
</tbody>
</table>

4. It is perverse that, purely because X number of homes is deemed to be needed and there are Y plots in Horsley which landowners have put forward, it is considered appropriate to move the green belt boundary just to accommodate a disproportionate number of homes irrespective of the effect on the community and its infrastructure. The whole process is arbitrary and appears to be driven purely by proposing the maximum number of homes which can be built on the land plots which Horsley landowners have put forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9190</th>
<th>Respondent: 10985057 / Anthony Parker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
</tbody>
</table>

Borough Wide Strategy – I OBJECT. 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4983</th>
<th>Respondent: 10986689 / Richard Harris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Do we really need the number of houses proposed - 693 per year - considerably more than the number given in 2012 of 322? Lots of people might want to live in this area but can they afford it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2411  Respondent: 10987137 / Susan Wong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. More than 40% of the houses proposed will be within a few miles of Burpham. It does not seem fair for Burpham to be having a disproportionate share of new housing with the associated problems and the upheaval when the building takes place and afterwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2180  Respondent: 10987137 / Susan Wong  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2

I accept that we need more homes in the area but the amended number is still very high. An independent analysis by a national expert stated that an annual build of 404 houses giving a total of 7676 houses over the period of the plan would be sufficient for Guildford’s needs. It is still higher than all the other boroughs in the area (SCC figures). GBC has not explained how it arrived at its figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9537  Respondent: 10987841 / Marion Bastable  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
** I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8964  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”: Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and
local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp16/8372</th>
<th>Respondent:</th>
<th>10989601 / Margaret Mew</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2008</th>
<th>Respondent:</th>
<th>10989761 / James Walsh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy S2, p29, Section 4.1.9:** The Council already has reservations about the financial achievability of several of its “big ticket” capital plans, including SARP and North Street (as expressed in the last O&S meeting). I am concerned, therefore, that this policy states that large development sites, *including strategic development sites*, will deliver the majority of new developments in the 6-11 year period and 11-15 year period. It would appear that the success of the second half of the Local Plan will depend on the viability and affordability of a few core programmes that already have question marks over them – making half of the plan an uncertain prospect before we even start.
**Policy S2, p30, Section 1:** The Council proposes to build 1,434 fewer homes as part of the revised plan. I question the wisdom of this at a time of increasing need for housing of all types.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/220  **Respondent:** 10989793 / Ruth Pott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I object most strongly to the disproportionate amount of development in one area of the Borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/8316  **Respondent:** 10990145 / Anne Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY S2**

**I OBJECT** to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The **housing number is based on pre-Brexit data** for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived
from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases theonus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17187 Respondent: 10990785 / Valerie Golding Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposal to create ribbon development along the A3 from Junction 10 of the M25 to Guildford with the development that are proposed for Wisley Airfield 2000 houses, Garlick’s Arch 400 houses and industrial space, Gosden Farm 2000 houses and Blackwell Farm. 1850 houses. This is what the Green Belt was set up to stop. Typical of the aptitude of GBC, they have totally ignored building on Brownfield sites other than more unwanted retail space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2111 Respondent: 10991841 / Abbey Jarman Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed local plan:

1. The reduction in the number of new homes in the Green Belt is insufficient. There is still an enormous number of new dwellings proposed for construction in the Green Belt, particularly when considered in proportion to the number of existing homes.
2. It is proposed that the area east of the borough takes an even higher number of dwelling in the Green Belt than before.

3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guilford has not. Although the objectively-assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford, which is disproportionate.

4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need a least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.

5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.

6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14623  **Respondent:** 10992225 / Emma Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
</tr>
<tr>
<td>2.</td>
<td>The Housing number is based on pre-Brexit data for economic and population growth, including migration. Given the result of the EU Referendum this now needs to be reconsidered.</td>
</tr>
<tr>
<td>3.</td>
<td>The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
</tr>
</tbody>
</table>

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It so unacceptable that Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6988  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only
deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11171</th>
<th>Respondent: 10998081 / David Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri–borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri–borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro–development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not
have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

attached documents:

Comment ID: psl171/2611  Respondent: 10998273 / Andy Lock  Agent:
I object to the housing number for the local plan particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I urge you to listen to residents whose lives will be so affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6004  
Respondent: 11000385 / Sheila Robins  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16820  
Respondent: 11000385 / Sheila Robins  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12005  
Respondent: 11000865 / Nicholas Clemens  
Agent:

Document:  
Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

The enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12011   Respondent: 11000865 / Nicholas Clemens   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am concerned that there is a lack of transparency in how the consultants have reached the housing need figures. With the United Kingdom is now exiting the EU and this will have the effect of reducing immigration figures.

There seems to be a lack of insight into changing retail usage and the fall in the need for retail floor space that could be freed up for residential homes, government planning policy recognises this and has made change of use easier. This would reduce the need for building on greenbelt and make town centres more vibrant with a higher number of residents using the facilities available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13886  Respondent: 11001249 / Lesley Milton  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td>I OBJECT to the fact that this inflated final target housing number results in</td>
</tr>
<tr>
<td>• up to a 35% increase in the number of households in West Horsley.</td>
</tr>
<tr>
<td>• up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield</td>
</tr>
<tr>
<td>The impact on the Horsley villages of such a huge mixed development would be enormous and the infrastructure cannot sustain this – see below.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3210  Respondent: 11001505 / Greta Edwards  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td>4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/548  Respondent: 11001505 / Greta Edwards  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Housing number – POLICY S2</strong></td>
</tr>
<tr>
<td>The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
</tbody>
</table>
I have read a number of analyses of the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA and am persuaded that the built up numbers which you have taken as the basis for deriving the development policy, are unsound. I therefore object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We consider that the Housing Targets on which the policy is based are derived from an Objectively Assessed Housing Need (OAN) and a Strategic Housing Market Assessment (SHMA) which are flawed. The modelling to produce the original number has not been demonstrated to adequately represent either the historic immigration figures nor the projected figures issued by the Office of National Statistics (ONS). The further increases made to the demographic starting point are in some cases inappropriate and in some case erroneous. Given that the proposed developmental needs in the borough are based on what we consider to be inaccurate data we object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13908  Respondent: 11002945 / David Guthrie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2155  Respondent: 11003681 / Elizabeth Milner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough

Why has industrial and warehouse space been proposed? There is room at Slyfield and this site should be fully developed to prevent proliferation of industrial areas in the Surrey Countryside. The logical thing would be keep them all on one site. The proposed industrial development of 7000 sq m is simply not required since the latest Employment Land Need Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. A new 4-way interchange onto the A3 at Burnt Common to serve this development would be disastrous for Send, Ripley 7 Clandon. Send Road (A247) would be gridlocked all day. Send would be the through route to Woking for traffic leaving the M25 & A3. Send cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16408  Respondent: 11004129 / Alastair Reid  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
HOUSING NUMBERS

The housing numbers proposed are for an additional 593 new homes in West and East Horsley within 5 years of adopting the plan. Indeed the proposed increase for West Horsley is an additional 35% of the existing households – the highest in the Borough.

This number is additional to the 2100 new homes planned for Wisley Airfield. This number is far too high for the existing infrastructure to handle and would ruin the nature of the Horsleys.

BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing not the Green Belt around our villages. I understand that Surrey University is sitting on permission for 1,500+ accommodation units on its own brownfield campus. If the University fulfilled its obligations much Town Centre affordable accommodation would be available for rental/purchase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6475  Respondent: 11005377 / Peter Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I understand that there are "brown field" sites involved in this plan but if the plan is approved it is almost certain that with the difficulties of getting full approval for these sites it is most probable that there would be enormous pressure on developing green field sites first. This is a really alarming consideration given that the Wisley development is projected to be over 2000 houses and there would be enormous pressure to develop this site very early on in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5735  Respondent: 11005697 / Mike Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the new Guildford Local plan as there is no explanation as to how the number of houses required in the borough has been calculated and this is fundamental to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16604  Respondent: 11005697 / Mike Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the new Guildford Local plan as there is no explanation as to how the number of houses required in the borough has been calculated and this is fundamental to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8540  Respondent: 11006145 / Peter Bradshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Housing Needs Numbers**

I OBJECT to the housing needs numbers included in the local plan as far too high.

An annual build of 693 new homes per annum represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics are projecting a population increase of some 15% for Guildford Borough over this same period. In particular over 23% of this new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, totally out of proportion to the population living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15275  Respondent: 11007393 / James Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3958  Respondent: 11008225 / Russell Pascoe  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/18456  Respondent: 11010081 / Julian Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With respect to the housing need, I do not consider that the case regarding the need for the proposed number of houses in Guildford borough overall has been proven, indeed the target house building programme proposed represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of national Statistics (ONS) projects a population increase of some 15% for the borough of Guildford over the same period. With respect to West Horsley specifically the number of new houses needed has not been proven and the Local Plan number for West Horsley is simply excessive. The scale of proposed development (in proportion far greater than other villages within the borough) does not reflect the need and fails to respect the local character and existing building density of the village. I am therefore strongly opposed to the current site allocation and housing densities proposed for all four sites in West Horsley.

Furthermore, in my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is not justified. The disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development, despite the numerous countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

As I set out earlier on, the Guildford Borough Economic Strategy 2013 – 2031 made no such case for locating large numbers of residential units within West Horsley. I am strongly opposed to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7545  Respondent: 11010401 / J M Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built-up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the draft local plan. I object on the basis of:

1. The entirety of the plan – the proposed scale of expansion it contains, the continued absence of supporting infrastructure and the complete incompatibility of the approach with Guildford’s current and traditional state;
2. In particular the proposed expansion on the West of Guildford, including the Blackwell Farm Site and other associated development such as the cathedral.

I also note that it is appalling that what appear from the information provided to have been only very minor changes to the prior plan have been made yet you insist on requiring fresh objections – the reality is that the plan recently proposed is not materially changed from that provided in 2014 and consequently all or almost all objections to that plan should remain.

The core reasons for my objections are set out below (for the avoidance of doubt all of these apply to the West of Guildford expansion as well as some applying to the overall plan) as follows:

Scale of expansion.

1. The proposed scale of expansion is incompatible with Guildford as a town and will dramatically change its character and the demands placed upon it;
2. The scale of expansion in absolute terms is too significant for a relatively modest town and is well beyond that which is required. The evidentiary support provided does not justify the scale of development proposed.
3. The relative scale of expansion vs. that proposed by other areas such as Woking – if the demand for such expansion is there then it should be met on a balanced basis across the region; and
4. The incompatibility of this plan with the town centre and the proposed plan. The town centre plan suggests that there will be less access to the town centre with less parking and a lower capacity for traffic. Implementing this local plan at the same time as the changes contained within the town centre plan is a recipe for complete chaos. While the revised plan refers to changes in the mix of transport, and hopefully there will be some, this will undoubtedly be insufficient to reduce overall traffic volumes in what is already an over-stretched town. Supply side changes are not going to be sufficient to cope with the level of increased demand proposed by the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. In the election period. This is not appropriate and in reality is an exercise in undermining local democracy. The plan is not appropriate and has only changed at the margins.

2. In addition the form and content of the document makes it virtually impenetrable for an ordinary person to access it. Producing a complex document, a summary of changes which relies on extensive reference to varied supporting documentation and with a range of meaningless soundbites and terms which only town planners are able to interpret does not create an accessible plan. Indeed both my wife and I have numerous post-graduate qualifications, and my wife even has a Geography degree yet the summary provided by you left us struggling to understand the changes and meaning of the document. The approach taken makes it very difficult for even the well-educated to read, interpret and assess the proposals in a sensible timeframe.

3. In short the consultation process has provided over-complex information on the local plan and is an attempt to grind objections down. It remains wholly inappropriate and should be completely re-thought from the ground up, rather than subject to variation at the margins – as has been the case. If this was activity undertaken by a bank then there would be calls for a public investigation and potential action for mis-selling – I fail to see why failing to consult properly in the public sector over a matter of this importance should be treated any differently.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1930  Respondent: 11014401 / Peter Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2443  Respondent: 11014881 / Linda Peters-Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Policy S2 - Borough Wide Strategy

I object to the proposal to build 13,860 new homes. If a lower number were proposed it would remove the need to build on the Green Belt.

The plan fails to set a housing target of new homes or explain how this relates to housing need. It exceeds the 13,860 total.

The assumptions and calculations are hidden and are using a model belonging to consultants that are openly pro development.

The projections for economic and population growth should be revised downwards especially in view of Brexit.

The West Surrey Housing Market Area is too small and adjacent districts of Rushmoor and Mole Valley are outside the area.

The area is artificial and the absence of a suitable alternative doesn't make 'West Surrey' reliable. There is a highly lopsided distribution of proposed developments in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16458  Respondent: 11015329 / Nick Riederer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I should also like to state that the extent and number of new houses proposed in the Horsley’s, Ripley, Send and Wisley areas is totally out of proportion to any local requirement, I believe the mathematical model used to develop the Strategic Housing Market Assessment is flawed, there is no industry or business case for increased housing on this scale (a 35% increase in West Horsley). If new housing is required it would be better to site it close to where that need really is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1850  Respondent: 11015489 / Lorraine Pipe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/8176  Respondent: 11023489 / Trevor Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that so much of the planned development is targeted on villages and semi rural areas in preference to brownfield sites that have clearly not been researched or prioritized appropriately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2043  Respondent: 11023585 / Jean Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”.

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7881</th>
<th>Respondent: 11024673 / Margaret Nicol</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I wish to object to the local plan.
I support the valid reasons given to you by the Guildford Residents Associations. Primarily it should not be considered without the infrastructure to support it

It appears that this is not being considered in conjunction with a plan for the centre of Guildford. This cannot be right. Guildford is becoming a nightmare.
I hope commonsense will prevail.

Please register my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6732  Respondent: 11024769 / Sarah Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys. These are small villages with distinct character and do not have the infrastructure to support the massive increase in dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16811  Respondent: 11024769 / Sarah Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8026  Respondent: 11027489 / J Pamplin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I consider the local housing numbers to be too high in the draft local.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11221  Respondent: 11028257 / David Conisbee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the over development of any one area in the borough
I object to the limited consultation period
I object to the last minute inclusion of new sites with less than 14 days notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1572  Respondent: 11028801 / Sandy Conway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3 Size of increase

The huge number of houses proposed is wildly disproportionate in relation to:
• the existing size of Guildford
• its housing stock
• its transport systems
• its overcrowded schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17254  Respondent: 11028929 / Christopher Webb  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Plan talks about the need for retail development, when this is clearly a reducing need. The plan needs to focus on urban building as opposed to retail allowing the "lungs" of Guildford to remain.

Has there been any analysis from a pollution perspective?, answer no.

This must be undertaken to understand the implications on our health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/707  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Local Plan for the following reasons:

6.) The Borough Wide Strategy (Policy S2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/709  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Guildford Local Plan for the following reasons:

...  

10.) The poor air quality pollution concerns (Policy I 3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5630  Respondent: 11029409 / John Lay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3852  Respondent: 11032129 / Claire Sinclair  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

West Horsley is being considered as two separate plots and therefore the allocation of housing is increased due to this. I feel baffled as to why West Horsley is split into North and South since it has only one small section of shops near Bell and Colville. The village should be considered as one entity. When viewed as such, it is clear that the proposed density of housing is an extraordinarily high percentage, once again far outstripping identified need, none of which warrants building on green belt land, or reclassifying green belt land because there are no exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13321  Respondent: 11032513 / Mary Candy  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

I wholeheartedly object to the proposals as a whole, due to the massively destructive impact it will have on the village of Ripley, and the neighbouring village of Send, as well as nearby areas such as Wisley, Clandon and Burpham. This impact would be felt not just with the implementation of these ill-thought-out plans, but for all future generations in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4235  Respondent: 11032705 / Mike Tarrant  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow Area of the Borough. 

I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16241</th>
<th>Respondent: 11033057 / Jo Komisarczuk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I Object to the loss of rural employment Policy E5, which supports the retention of local services and businesses within our rural communities. Garlicks Arch will result in the loss of four such small and local businesses, two of these have been in existence for over 30 years and the other two for about nine years. Therefore this plan does not support or promote rural employment; rather it is ending valued local businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17804</th>
<th>Respondent: 11033921 / Tim Depledge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document, complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Planning for the borough - our spatial development strategy - I object- The basis of the calculations are neither transparent, nor, appropriate given the recent landmark changes in our nation's direction and future. Also, an assumption to meet a defined target which cannot be justified cannot be considered reasonable within the modern age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6758</th>
<th>Respondent: 11033985 / John Peachey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to all the proposed sites in Send because they were not included in the previous consultation. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads, including the A247 which are all already at 100% capacity. GBC has completely failed to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and Green Belt. GBC have also failed to include the Town Centre Masterplan 2015 within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13778  Respondent: 11034337 / Judith Hill  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also STRONGLY OBJECT to A27, A28, and A29. I can only imagine the impact this will have on local traffic. The roads are already far too busy, and the existing infrastructure is already under pressure. Also, there are already flooding problems in parts of Ash.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12689  Respondent: 11034881 / Amy Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to object to the local plan on the basis that, despite the minor changes made, it still commits Guildford to development that I feel is inappropriate for the town and area, in scale and nature. I continue to object in particular to the planned large-scale expansion into the Green Belt at the Blackwell Farm site. Many of my points remain the same as I have not seen much in the amended plan to change my views.

Scale

The scale of development proposed in Guildford still seems completely out of proportion to the town. The proposed developments significantly increase the footprint of the town and encroach considerably into the countryside that helps make our town so special, materially changing Guildford for the worse for local people. It still makes no sense to me why our borough is proposing greater per annum building targets than areas such as Woking and Weybridge. I also believe that Housing ‘need’ continues to be subjective whatever ‘assessment’ you do – people ‘wanting’ to live somewhere is not the same as needing to, and building lots of housing attracts people, making the assessment a self-fulfilling prophecy. Furthermore, the recent decision to leave the EU and reduce immigration as a consequence, coupled with the projected
reduction in economic growth reinforces the view that the population projections on which your assessments were based overstate the required level of development and need to be urgently reassessed.

**Inappropriately overburdening some areas**

Despite it stating in the local plan document that, ‘We have sought to select sites carefully and in a way which does not overburden any single area of our borough and ensure that the right infrastructure is in place’, this is clearly not true in the case of the Manor/Blackwell Farm development, which would be hugely overburdening the west of Guildford. This is especially true in light of the additional proposed development at the cathedral site.

**Character**

I believe that the large scale developments planned will materially damage the character of Guildford and make it a less desirable area to live in – after all the unique urban/rural character of Guildford is surely what drives the demand to live here – certainly it was for us. The approval of this scale of development would be enough to prompt us to consider moving elsewhere.

**Plan**

Finally, I want to draw attention to how inaccessible I found the consultation documents and the ‘presentation’ video on your website – I am educated to post-degree level and still struggled to follow what you were talking about at times. In addition, the sheer volume of paperwork that we have had to wade through to prepare an objection must be hugely off-putting to many people. I can’t help feeling that the council will be forcing the plan through and claiming reduced objections when this is not because less people object but rather as a result of people getting ‘objection-fatigue’ or being put off by the way the volume of information is being presented, where even the maps a very difficult to interpret, particularly on a computer screen where you are forced to zoom in and out repeatedly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17722  **Respondent:** 11036129 / George Dokimakis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We are calling on the Council to include the development of the River Wey to the Local Plan and ensure a holistic development for our riverfront and town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/12684  **Respondent:** 11036193 / Wayne Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support the Guildford Residents Association (GRA) response to the proposed Local Plan and totally oppose Guildford expanding by a quarter.

I also feel that in light of BREXIT the data that the Plan is supposed to be based on regarding population and housing need is now invalid and must be reassessed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/518  Respondent: 11036193 / Wayne Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14106  Respondent: 11036289 / Osman Abdullah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of
the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.
The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. THE NEED TO APPLY CONSTRAINTS Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Disproportionate size of sites in relation to rural locations

I object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield. The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent and negative impact on each of these communities.

1. Unbalanced allocation of development in one area of the Borough

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

1. Gerrymandering

The concentration of Green Belt development is not only disproportionate to the rest of the Borough but has been disproportionately applied to Wards that are not lead by a Conservative borough councilor. For example, the Ward of Lovelace (Liberal Democrat) accounts for 15% of the Borough’s population but has been allocated 35% of the proposed house building. The Ward of Send (Guildford Greenbelt Group) has also been given a disproportionate amount of house building. The coincidence of this is statistically significant and demonstrates at best a form of punishment to Wards who did not elect a Conservative borough councilor and at worst a form of gerrymandering.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With 5,000 homes planned to be built in and around the Ripley, Send, Horsley, Clandon and Burpham area, it is completely unsustainable and will damage the local area and its infrastructure.

There are far too many plans for houses to be crammed into an area which can’t take it, rather than using existing brownfield sites closer to existing urban areas and transport links

In conclusion, I object to the new Guildford proposed Local plan because of the enormous pressure it will put on the local resources and amenities, the increased amounts of traffic and the loss of rural identity. I specifically object to the developments at Wisley Airfield (A35), Garlick’s Arch (A43), Gosden Farm (A25) and Tannary Lane (A42) as well as the other smaller plans in Horsley (A36-A41). I urge the council to take these objections into consideration and reconsider the removal of the Green Belt status.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14578  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I have the following objections to the proposal to build 13,860 new homes:

1. Numbers of homes based on growth and demographic data including migration, are no longer valid in view of Brexit. They should be revised to a lower figure.

2. No justification for the housing figure is given and the Council has failed to reveal the formula for its working this out. The public cannot be expected to be consulted without this information as it is fundamental to the draft plan, and therefore makes a mockery of the exercise!

3. No definite housing target for new homes is given, and the plan fails to make sense of its relation to an "Objectively Assessed Number" for housing need. This is confusing. Moreover, the Council contradicts itself by saying it relies on the OAN being the number for houses because it is deliverable whilst saying the infrastructure problems may cause constraints. The plan does not say how many homes the Council want to build and therefore allows this figure to be made up.

4. The Housing Market Area (HMA) has been wrongly used incorporating 2 other boroughs of Woking and Waverley creating an area 'West Surrey' which is artificial and too small and ignores Mole Valley and Rushmoor nearby districts. Many people commute to Guildford to shop and study and live outside the Area. The figures are distorted and unreliable by the plan using this HMA. There is no reason why Guildford needs to build twice as many large housing estates as the rest of Surrey put together. It is a completely unbalanced proposal.
5. The very high numbers of homes suggested would change the character of the borough from mainly rural and Green Belt to urban creating a band of development out of London. It would destroy the borough for residents now and for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLP16/16514  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The idea of a single housing strategy for the complete borough is badly flawed. It is completely wrong to treat very different areas which have different requirements, in an identical way to attempt to justify the numbers of houses proposed by Policy S2. The secret method of counting the numbers of people and houses required, has not been scrutinized by the councillors and therefore must be discounted. There is no justification or explanation of the 13,860 houses required by this proposed policy and the growth and demographic data put forward are invalidated by the events of the referendum and subsequent Brexit. The council uses projected numbers produced by consultants (GL Hearn) who as part of the Capita Group, have a vested interest in building and development (surely a clear conflict of interest).

Additionally there is no housing target. A requirement and a target are not the same thing and could thus be manipulated with impunity.

The effect of this proposed policy would be to devastate the villages and the environment around Guildford. According to the council figures, twice as many large housing estates are required in Guildford –more than in all the rest of Surrey put together. There is no justification for this. The character of Guildford would be irrevocably changed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1515  **Respondent:** 11036801 / Judith Mercer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy S2( Planning for the Borough-our spatial development strategy)

I object to this amended policy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) prepared by GL Hearn because it has not addressed many of the 32,000 objections to the 2016 version of the plan. I am informed and agree with the opinion that the OAN(objectively assessed need) figure of 12,426 is far too high.

I am very concerned that GBC has adopted this figure as its housing target without applying constraints required by the NPPF and National Planning Policy Guidance(NPPG).I am informed that a study of the GL Hearn report by NMSS has revealed that the SHMA was flawed in its calculation as it was based on incorrect population figures from the ONS(Office of National Statistics).It proposes reducing the figure for homes to 400 per annum.I understand this is
justified on the basis of the under recording of students leaving Guildford. The analysis of this has been put to the Council by the GGG (Guildford Green Belt Group) which makes it clear the report by GL Hearn should not be relied on.

I therefore object to the target of 580 homes per year because the GBC has based calculations on over estimated population growth for the period 2015-2034. I object that 70% of sites put forward are still in Green Belt contrary to planning policy. Green Belt is an absolute constraint on housing supply. They have not reduced number required by national guidance available including-

- Exceptional or very special circumstances
- Housing need doesn't justify development in Green Belt
- Government paper on planning for housing gives guide

“Need alone is not the only factor to be considered when drawing up a local plan “including”land designated Green Belt and SSSIs”

“ The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006) 14 June 2017.

I object to the fact GBC has not chosen to apply the government guidelines and has not lowered the housing target because of the restraints which can and should be imposed by them. The guide on housing need came in before the above paper, which said that if the Council is unable to build houses without impinging on the Green Belt then it wouldn't need to build so many houses. The policy S2 specifically goes against the rulings and guidance of national policy and the adopted wording of the draft plan in Policy S1.

In view of the above it would be logical to apply constraints in line with government policy to a revised OAN figure of 50% to account for the fact that 89% of the borough is in the permanent Green Belt, and development is not supported by adequate infrastructure. I am informed that this would be in line with the 50% constraints applied by Woking Borough Council. This would result in a much more acceptable and achievable housing target of 200 homes per annum totalling 4000 over 20 years of the plan. Thus all these homes could be built on existing urban brownfield land, where there is also existing suitable infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10763  Respondent: 11037089 / Yan Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have the following comments regarding the draft Local Plan:

- After reviewing all the information available to me, I support the Guildford Residents Association response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1714  Respondent: 11037089 / Yan Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having reviewed the new evidence, Guildford’s proposal for more than 12,426 homes and a buffer of 1,155 homes, is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11139  Respondent: 11037185 / Jonathan Parr  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my strong objection to the Local Plan. Mu main objections are that there has been no attempt to justify the level of proposed housing. Our roads are already gridlocked and the transport infrastructure cannot support additional traffic. The existing water and sewage infrastructure will not cope with the proposed level of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3721  Respondent: 11037921 / C. H. Morris  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I believe that the current “salami slicing” tactics will result in the end of the competitive advantages that Surrey has over the other counties that border London (and indeed the areas around other capital cities across Europe). A more strategic approach is needed that will create the housing needed in much larger developments. Developments that will include new houses, medical and shopping centres and modest office accommodation in the way that was achieved with the Goldsworth Park development outside Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11161</th>
<th>Respondent: 11039105 / Robert and Judith Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

### General objections

**I object.** Overall the Draft Plan does not appear to be well thought through or reliably evidenced. There is an opportunity for the Plan to lead the way in sustainable policies and brownfield development which it completely fails to do, preferring instead to use green field sites which maximise short term profit for developers at the expense of others.

To be clear I do not object to housing development per se. The rising population must be accommodated. However, **I do object** to Guildford Borough having more development than surrounding boroughs and to disproportionate green field (and Green Belt) development being proposed when options for brownfield development in urban centres with appropriate supporting infrastructure have not be fully explored.

There is a housing need for lower income earners, and social housing for others including vulnerable persons. The Plan does nothing to address this and everything to support the development of larger homes that are unaffordable to these groups: the developer profit motive appears to have disproportionately influenced the Draft Plan. **I object** to this approach which must change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11166</th>
<th>Respondent: 11039105 / Robert and Judith Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

**Calculating the overall number of houses needed (Policy S2)**

**I object.** The Plan must revise the number of houses required, probably considerably downwards, in the light of the referendum decision to leave the EU. Even if there was no Brexit, the number of houses proposed by the plan fails to take account of the geo-location of Guildford Borough with adjoining population centres and the transport links to them. The number developed does not account for adjacent boroughs such as Rushmoor and Mole Valley, nor the Impact of the London commuter populations. Better market data should be sought to provide a reliable basis to the Plan. The resulting Plan shows lopsided distribution of new housing with adjacent neighbours developing far less and Guildford Borough more. The absence of objective scrutiny on the consultant’s assumptions and projections removes confidence in this Plan as a basis for future housing development in the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4668</th>
<th>Respondent: 11039297 / Juliet Bradshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the New Local Plan which has ignored the issues and concerns raised in my previous objection to the last plan. For example, the housing plans for developing Ockham (Three Farms Meadows) have been proved to be unsuitable for the area and rejected by Guildford Borough Council yet it appears in the New Plan as a strategic site which allows it to be considered for housing development more easily in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4669</th>
<th>Respondent: 11039297 / Juliet Bradshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

'Focus on sustainable growth' - there is nothing sustainable in this plan. Land in the green belt is to be lost and the huge number of houses proposed for our area will adversely affect and degrade the environment and lead to more pollution. How can a 35% increase in housing for the Horsleys be considered sustainable? 'Focus on substantial growth to the detriment of the environment' is a better assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4670</th>
<th>Respondent: 11039297 / Juliet Bradshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
Addresses future housing, employment and infrastructure' - There is no guarantee that this plan addresses future housing as it does not provide truly affordable housing. Affordable housing in our area is a mockery as these houses are priced at £750,000 plus, which is well out of the reach of the young and people on medium incomes. The need for Council homes has been ignored. Possible employment opportunities are being reduced in our area such as the local camp site which is likely to be replaced by a housing estate. Plans for infrastructure have been kicked into the long grass and there will be a breakdown in services as the infrastructure is not fit for purpose now. 'Ignore future housing, employment and infrastructure needs' is the plan's proposal for West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9394</th>
<th>Respondent: 11039681 / Bruce Jeffeson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10137</th>
<th>Respondent: 11039681 / Bruce Jeffeson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15981</th>
<th>Respondent: 11040481 / D G Spratt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial
development rather than for housing. This is enough to meet our real needs for affordable local
homes. There are enough vacant commercial sites to cope with genuine business need, and we
have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

2. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “West Surrey” is much too small. Half of Guildford Borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

4. The OAN/housing number of 13860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

5. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

6. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken - this is not a sustainable strategy.

7. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. There will be a significant increase in traffic flows along the A247 through West Clandon, funnelling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge will be built on Green Belt land which was zoned to safeguard the countryside from encroachment and check the sprawl of large built up areas.
8. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

I object to the proposed increase in the number of Travellers’ pitches. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

[Summary of redacted paragraph: Objection to the proposal for additional traveller pitches, often in the Green Belt. The proposal would increase tension with the non-traveller community and have social, economic and environmental impacts]

The open-ended wording of the numbers to be permitted (at least 73 “or any new target as identified within an updated Traveller Accommodation Assessment”) is dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1896  Respondent: 11041281 / Chris Harlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16100  Respondent: 11041569 / Peter Belton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Developers must use the many brown-field sites identified in the Borough before any other sites are even considered. Developers (and some Councillors) put profit above every else, leaving the taxpayer to pick up the ongoing bill for inappropriate development and inadequate infrastructure improvement.

We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12472  Respondent: 11041601 / Robert Bayley  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

MISUSE OF GUILDFORD TOWN CENTRE AND EXISTING BROWNFIELD SITES

I OBJECT to these proposals.

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre.

There is falling demand for retail space in town centres throughout the country as internet shopping continues to grow (see independent research and CEBR studies). Guildford is a prime example. What Guildford needs is a new focus on speciality high quality shopping supported by a revival of the town’s heritage core, historic visitor attractions and a diverse selection of restaurants.

As an existing urban centre, it should furthermore receive a larger share of proposed new housing by making use of its brownfield sites.
Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5372  Respondent: 11041857 / Catherine Carr  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3 The scale of the house building programme which is based on unclear methodology that provides an estimate of housing need of 25% in contrast to that provided by the ONS of 15%

I therefore object to the Local Submission Local Plan.

More detailed arguments are set out below

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5375  Respondent: 11041857 / Catherine Carr  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Strategic policies - Policy S2 Borough Wide Strategy.

This policy has the objective of adding over 13,000 new homes over the 15 year period, which equates to an annual build of 693 homes per year. This is a net increase of 25% in the housing stock, whilst the ONS is projecting a population increase of 15%. There is no adequate explanation for this discrepancy.

The West Surrey Strategic Housing Market Assessment, (SHMA) is faulty in that it estimates 517 houses as the demographic starting point which is what the ONS predicts but then adds in additional homes to “support economic growth”, which is already factored into the ONS statistics. A further 31 homes per annum are included to “improve affordability” where the GBC Affordable Housing Policy H2 already includes that most development sites would include 40% of their homes as affordable.

My reading of the document is that GBC are trying to convey that the housing numbers are needed to fulfil the NPPF requirements based on central government policies whereas the numbers are based on local and political aims.

I therefore object to the housing targets set out in Policy S2

APPENDIX
The following table sets out an analysis of new housing developments proposed in the draft Local Plan and provides an estimate of the new of developments which are set within the Metropolitan Green Belt:

**Planned Delivery between 2018 and 2033 (See Policy S2, page 27)**

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Currently Greenbelt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,172</td>
<td></td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
<td>1,570</td>
<td></td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>91</td>
<td></td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
<td>431</td>
<td>Y</td>
</tr>
<tr>
<td>Rural exception housing</td>
<td>90</td>
<td>Y</td>
</tr>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion (Policy A46)</td>
<td>1,100</td>
<td>Y</td>
</tr>
<tr>
<td>Village extensions (including Ash Green southern site)</td>
<td>993</td>
<td></td>
</tr>
<tr>
<td>Ash Green southern site (Site A27)</td>
<td>58</td>
<td></td>
</tr>
</tbody>
</table>
Village extensions (excluding Ash Green southern site) 935 Y

Windfall 625

Totals: 13,652 8,895

Proportions: 100% 65%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11544  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12702  Respondent: 11042433 / Sam Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9656   Respondent: 11043041 / James Withers   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2: BOROUGHWIDE STRATEGY: Object
• The Draft Plan does provide evidence of need for 13,040 new homes. No rationale is given for how this number has been arrived at.
• Guildford Borough Council does not say whether the number of houses they want built is more, less or the same as this figure. A housing target is needed for residents of the borough to take a considered view about the proposals.
• Increasing the size of West Horsley as proposed will change the character of the village and put significant strain on local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9430   Respondent: 11043073 / Ingrid Botha   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the approach to consultation that the Council is taking. The Council withdrew the 2014 draft Local Plan following an outcry from residents. During its re-drafting, instead of arriving at a sensible alternative the Council has changed every major site in Send and added a massive new road junction. It beggars belief that the Council could on one hand state that they listened to residents, whilst on the other hand increase the planned housing levels in the village. Either way, the proposed changes are significant and therefore require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9433  Respondent: 11043073 / Ingrid Botha  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated housing need figure in the West Surrey Strategic Housing Market Assessment on which the Draft Local Plan is based. The Council has declined to provide any objective evidence to substantiate the projected housing numbers, which in my view is far in excess of reality. In particular, I believe the calculation of foreign students has been wrongly used to inflate the housing need. Furthermore, the housing number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

I object to the fact that the impact on infrastructure has not been considered sufficiently. Current infrastructure is utterly inadequate to deal with proposed new housing levels. Roads, doctors and schools will be unable to cope. Yet no tangible resolution has been proposed.

I regularly cycle in and around the villages of Send, Ripley,

I object to the development of the 400 houses at Galick’s Arch. It was included in the Local Plan at the last possible moment, with no prior local consultation It is not required in terms of housing need either for the village or the borough.

I also object to the development of the 400 houses at Galick’s Arch on the basis that the site is liable to severe flooding. The ancient woodland is a particularly sensitive area that must not be disrupted in any way.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10929  Respondent: 11043425 / Melinda McLean  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that we will not be listened to on this matter and you will do whatever you please which is just bad Government!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5494  Respondent: 11043553 / Geraldine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only
deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11986  Respondent: 11043809 / Andrea Moran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the implementation of the GBC local plan.

There is NO Plan, that recognizes the existing borough’s settlement patterns, existing business or existing infrastructure. This plan does not create a good blueprint for the future by provides for an economic, social, and environmentally sustainable plan for the future of the borough.

This is a short term plan with an eye fully focussed on the government subsidies to be gained from new homes bonuses from central government and CIL and section 106, it does not plan for the borough in a way our children and our children’s children will thank us for accepting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14588  Respondent: 11044129 / Christopher Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data.

There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these
constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

I would remind you that in 2009 Guildford Borough Council successfully challenged the Government’s South East Plan (SEP) to build 422 homes a year – 100 more than initially recommended by the South East England Regional Assembly – so the figure should be 322 homes a year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17004  Respondent: 11044513 / Jon Stranger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my opposition to the Local Plan.

In general I object to the proposed severe reduction in the Green Belt. This is not justified by the Plan, which includes highly dubious claims about housing needs but which, even if true, could be fully met using existing brownfield areas in and around Guildford which would in any case be much closer to existing facilities and infrastructure. And there is also a significant amount of land supposedly belonging to the University which does not appear to be considered for development, even for student accommodation. To attack the Green Belt now would destroy forever a valuable and attractive rural landscape which also supports essential wildlife and local recreational activity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6752  Respondent: 11045601 / Chloe Hartwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Number of New Houses Proposed

Whilst we must all take our fair share of new housing to meet the current demand, the number proposed for West Horsley seems vastly out of proportion when the size of the village is considered. I understand that it will be a 35% increase in the number of homes in our small village. This is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
A lot of work has gone into the Local Plan. It is obvious for anyone who has read through the Local Plan that the Guildford Borough Council’s civil servants have done an excellent job with the brief that were given. Unfortunately the brief does not address the borough’s needs adequately.

The situation we find ourselves in and in need to remediate is the result of the short-sighted 13 years of Conservative leadership of the GBC. We are in need of housing, both social as well as for the professionals in low to average income jobs that support Guildford’s borough; nurses, police officers, retail workers, bus drivers and a raft of other professionals struggle to find affordable accommodation within Guildford. This results in most of them living outside Guildford and commuting into town, resulting in part in the traffic gridlock most of us experience on a daily basis trying to traverse the city centre. The policies put forward by the GBC do not address the needs of our Borough.

We are calling on the Council to respect the nature and character of our villages and impose a maximum development target of 20% housing every four years (of the total number of houses envisioned in the Local Plan).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. POLICY S2

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

I object because the housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

I strongly object as these concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

I object as the plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

I object to the Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.
I object because the Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

I object because the development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

I object because it is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

I object to the proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) as they will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. The impact on the surrounding highways and roads will be hugely significant and extremely damaging.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2084</th>
<th>Respondent:</th>
<th>11047329 / Hazel Corstin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>Sound?</td>
<td>( )</td>
<td>Legally Compliant?</td>
</tr>
</tbody>
</table>

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with any residents. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).
2. Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis is on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.
3. I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.
4. Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.
5. I object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14366  Respondent: 11047425 / Ian & Karen Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing.

The scale of housing proposed will severely impact road congestion and the use of local amenities. The proposed growth is anything but organic and would require a fundamental review of amenity availability and use, which is lacking from the current proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14531  Respondent: 11047681 / Robert Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Relative size of proposed developments

The level of development proposed within East and West Horsley at 35% is vastly out of proportion to that of the size of developments within the rest of the county. The village cannot accommodate that level of development without major investment in infrastructure and other local provisions.

Village character

The proposed high-density housing sites within the villages are totally out of character with the current low density settlement, and will have a big impact on village life. It may not be the most picturesque of villages within the area, but
there are historic buildings within it, and the village has a strong community. New housing developments should maintain the sensitivity of this.

Summary

I welcome the construction of new houses in the area in a sustainable fashion, in line with the sensitivities of the area, and within the capabilities of the village infrastructure and services. As outlined above, the current proposals are inadequate and do not meet the requirements outlined by government. I therefore hope that you will reject the proposals in their current state.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16205  **Respondent:** 11047809 / Jeremy Frost  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the plan’s housing figure put forward of 13,860 houses. In addition to questions already being raised about the accuracy of the model used to obtain this figure, it is also pre Brexit, so most likely the figures will need to be reduced significantly. A lesser, more appropriate housing target, could then be accommodated using mainly Brownfield sites.

I object to the proposed disproportionate allocation of new houses across the borough. When looking at the existing numbers of houses in the Horsleys, we would be having an increase of 35%, compared to eg. urban Guildford which is only allocated 11%. Such a high density housing development would completely change the character of our small villages forever.

I object to Guildford Borough Council not looking closely enough for suitable Brownfield sites in urban Guildford which should be targeted first for development. These sites would mean the Green Belt is not destroyed and on a more practical level, they already have the infrastructure in place eg sustainable transport options, to cope with the increased numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/12924  **Respondent:** 11047873 / Mary Waldner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )
I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12941  Respondent: 11047873 / Mary Waldner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6520  Respondent: 11047969 / Richard Poppe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I drive to my place of work each day from West Horsley. My route takes in the A3 and M25. I am acutely aware that the local road structure is completely unsuitable for today’s level of traffic. The queues every day on the A3, both north and south, on the M25 access roads, in both directions, and on the M25 itself, are totally unacceptable. It is a vital imperative that the Authorities take immediate and major action to relieve the congestion that is currently choking our roads. This is the situation today, and before any consideration of the significant increase in commuter vehicles as a result of these ‘plans’. I believe that there are further very large developments planned for nearby areas such as Burnt Common and Burpham. I see considerable unemployment and urban degeneration resulting simply from the inability to travel to any place of work.

This is, of course only one area where the infrastructure is totally overwhelmed. Many people, more qualified than me will explain the equally, or probably even more important, impossible situation with regards to schools, medical facilities, shops and public transport and other aspects of local infrastructure. None of these appear to have been adequately addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16462  Respondent: 11048001 / Robin Dorran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to (policy S2) as the plan is unbalanced with too much proposed in the north east of the borough with large developments in Ripley/Send (A43) Clandon (A25) and Wisley (A35) and will result in the urbanization of these important villages which do not have the infrastructure to cope with such an increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/670  Respondent: 11048289 / Susanna Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The protection of the Green Belt, the Lungs of London, has been of paramount importance to generations and should be upheld at all costs.

It is known that pollution from traffic is detrimental to the brains of growing children and no good for the health of anyone. Development on the scale recommended is tantamount to murder. In particular, the building of the A3 Ripley Bypass some 40 years ago was to avoid the blockage and unreasonable amount of traffic going through Ripley. What does the Council think will happen now with so much proposed development to the traffic on our local roads? It is a 'no brainer' except for the very stupid. We will be back to square one, just as we were when a Guildford bypass had to be built to avoid the bypass that was already there.

Parking in Ripley is impossible for residents. As an ageing resident of Ripley I have to walk a mile to get to the shops and am unable to carry anything heavy home apart from the newspaper and perhaps some milk and the odd vegetable. How much longer I shall be able to continue to do this is in the lap of the gods. We have been promised proper parking in Ripley ever since I moved here in 1975 and almost as soon as it was provided it was taken away for development and the smaller car park there now provides parking for the "affordable housing" development recently built on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16256  Respondent: 11048481 / Patrick Oven  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing proposed for Send was initially 435, then on the amended plan, (after a sustained and effective campaign by the Save send Action Group), 185, now on the latest plan, 485 houses. The proposals have changed each time not only as regards the number of houses to be built, but also their location. This suggests the Council has never had a clear plan - rather it smacks of desperately making policy on the hoof. It does not inspire the confidence of residents in the planning process on something that is going to affect them for decades to come. The proposals as regards the Send, Send Marsh and Burnt Common area are utterly disproportionate - the areas on the edge of the Borough closest to Woking are being asked to bear an entirely inappropriate amount of the development proposed in the Guildford Local Plan. I do not object to all development in the area, so trust I cannot be accused of "Nimbyism".
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16126  Respondent: 11049185 / Alan Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. Any development of housing should take place within the bounds of the Guildford Urban Area where sufficient public transport exists (the council having cut public transport out to the villages) and could be used by commuters. The very last thing that is needed is housing where the occupiers would require cars for commuting as that will just make the traffic problems in the area worse.

2. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

1. Highways England have already indicated that the A3 is at overcapacity, having objected to further parking at the Royal Surrey County Hospital on the grounds that it would increase traffic problems on the A3. Any proposed development outside the town boundary will just put further pressure on the local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7544  Respondent: 11049473 / Victor Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/243</th>
<th>Respondent:</th>
<th>11051521 / J and M Baylis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

4.1.9 Noted that North Street is now included as a Strategic Site.

Housing numbers now given, rising from 450pa to 850pa over the 15 year period.2019 to 2034, totaling 9,810. This leaves 2,616 to be delivered during the four years 2015 to 2019, an average of 654 per year. This looks unrealistic compared with the numbers for the subsequent four years 2019 to 2023, which total 1,900. I do not understand why the table in the LAA shows a target of 654 for the first four years. For all subsequent years the targets follow an upward profile. Why not start at 380, the 2015/16 net completions, and profile up more steeply from there? The early deficit would then largely be removed. The use of 654 for the first four years appears to be highly arbitrary. Furthermore the sudden start of so many sites in 2019/20 seems highly artificial. However I support the general strategy proposed, except that the total number of new homes needed is less than 12,426.
“4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” This is not made obvious: see above.

4.1.9b It is not clear in the Plan where the crucial evidence is for the rolling five year supply in the short term. A Table roughly like Table 1 should be replaced by a diagram which gives a broad brush picture of how the housing target will be delivered over time (i.e. the diagram in the LAA). Some of the key LAA information should be brought into the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/12829  **Respondent:** 11053825 / Claire Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

---
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12310</th>
<th>Respondent:</th>
<th>11054049 / Clare Goodall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Section page number 838 of 1722

Document page number 1539
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16791  Respondent: 11058913 / Tarn Stroud  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
The annual housing targets are far in excess of what is required for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17084  Respondent: 11060065 / Meredith Hopkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having written to voice my concerns and objections, as an East Horsley resident, during the 2014 consultation period, I now write to express my concerns about the new Guildford Local Plan, particularly as it relates to the Horsleys, Effingham, Ockham and Wisley. I am not opposed to housing development, per se, and, as I live on a council estate, I am not driven by concern about a reduction in the value of my property. I am, however, concerned that, despite the undoubted time and money that has been spent on consultation and map work, the proposals lack coherence and seem to have been driven by an arbitrary mathematical model of projected housing need in Guildford Borough which is well in excess of the official national estimates for local population growth. The proposed scale of housing increase is out of all proportion to the character of these villages. In addition, the proposals also do not seem to cater for a mixed population which, given that it is the youngest and the poorest in our society who have the greatest need of accommodation, calls into question the drive to build so many new, large and very expensive properties unless it is just for profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14248  Respondent: 11061185 / Peter Komisarczuk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. Why do you need to buck the trend?

The proposed Plan is unbalanced across the borough; there is a lot of development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

That is 36% of all the proposed Plan’s new housing proposed within this area, which has only 11% of the existing housing. Is this because the members of GBC do not live in these areas (as has been reported) and so are biased in their decisions?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/17418</th>
<th>Respondent: 11063233 / David Ebdon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are many brownfield sites available in the Guildford town centre which at the moment is being earmarked for commercial development rather than for housing. These sites would be enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing. Surrey University already has planning permission for more than 1,500 accommodation units on its own brownfield campus but for several years has postponed this development. If the University were to complete this development, much of the town centre affordable accommodation would be available for rental/purchase.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/885</th>
<th>Respondent: 11066401 / Vivien Meldrum</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S2- The policy is unsound as the OAN is still far too high and should be set at no more than 404 new homes per year in accordance with the advice of NM Solutions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16735</th>
<th>Respondent: 11070113 / Alison Hague</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

Section page number 841 of 1722
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri- borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt.

It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The road infrastructure in West Clandon has the added disadvantage that West Clandon is a linear village and the road through it is narrow in places with many bends and poor visibility for access for pedestrians and vehicles alike. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13,000 is far too many: they would turn us into an urban extension of London, like Croydon. Why does Guildford have to build twice as many large new housing estates as the rest of the county put together?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17747  Respondent: 11071649 / Martin Southcott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

the proposal to use green belt land for so much of the housing when brownfield possibilities have not been fully explored and used first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2548  Respondent: 11071649 / Martin Southcott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I believe that the evidence used for population growth (an OAN of 12,426) is incorrect, giving a major overestimate of likely future housing needs. This is in part due to under-recording of students leaving after finishing their studies and due to an unacceptably low proposal of the proportion of students who should be accommodated on campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12382  Respondent: 11074465 / Louise Vaughan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA); the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
The Plan in general, and this policy in particular, does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17452</th>
<th>Respondent:</th>
<th>11079361 / Alan Dillon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

I object to the proposed use of greenbelt sites in the Plan when the opportunity to use brownfield sites has clearly not been properly explored. Development of the greenbelt should only occur in exceptional circumstances.

The University of Surrey should fulfil its obligation to provide much more student accommodation on campus, thus freeing up local housing for normal residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound.

A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra.
homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth.

The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.
THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.

Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
To elaborate further, the proposed increase in the population of the areas affected by the June 2016 Plan substantially exceeds any increase arising from “organic” growth of the existing resident population of the Borough.

It is also clear that the primary beneficiaries for removing areas from the green belt protection are not the existing Borough residents but are

1. property developers together with a small number of people with vested interests in such developments taking place, and
2. people not living in the borough who might become potential new residents as a result of housing developments in current green belt areas.

There is absolutely no sound case as to why priority should be given to the interests of groups i and ii over the interests of the existing Borough residents. In fact, clearly the contrary is the case.

It is clear that there is overwhelming support for retaining the protection for our green belt areas in the Borough. The open and accountable local government required these days, demands that the Borough Council follow the views of the majority of the Borough population on the issues of:

1. What sort of size of increase in the resident population numbers we want to have in the Borough as a whole.
2. What sort of percentage increase in housing numbers is acceptable to existing communities within the Borough.
3. What types of housing developments the existing communities want to see in their areas.
4. Which alternatives, Green Belt or other sites, we want to see used for the proposed new housing developments.
5. The committed and Council-funded increases to infrastructure that need to be in place ready to support new housing developments before these swamp existing facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/2914  **Respondent:** 11086433 / Colin Carmichael  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15059  **Respondent:** 11095905 / Joanna Holden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including The land at Wisley Airfield is adjacent to land with endangered species and any development could harm those species.

1. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity. Any development of housing should take place within the bounds of the Guildford Urban Area where sufficient public transport exists (the council having cut public transport out to the villages) and could be used by The very last thing that is needed is housing where the occupiers would require cars for commuting as that will just make the traffic problems in the area worse.

1. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
WE OBJECT to the Borough Wide Strategy (Policy S2)
a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and
does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This
approach differs from all the other Borough Councils in Surrey.
b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now
need to be revised downwards, possibly quite seriously.
c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of
Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside
“West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more
complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public
consultation on the SHMA and Councillors were not allowed to scrutinise it.
The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore
are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford
residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford
wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100
units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of
the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden
Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing
being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards
represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of
housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2) I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

3) I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.

The road infrastructure in West Clandon has the added disadvantage that West Clandon is a linear village and the road through it is narrow in places with many bends and poor visibility for access for pedestrians and vehicles alike. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2395  Respondent: 11104033 / David Dutton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.
- My objections to increased traffic on the A247 through West Clandon are outlined more fully elsewhere but include: (i) although notionally an A-road the A247 is narrow and winding in parts and is most unsuited to carrying additional traffic, (ii) the A247 has a single non-continuous footpath in several sections, (iii) a care home, a church car park and a pub, as well as very many houses, are located on the opposite side of the road to the only footpath, making pedestrian access difficult for people moving about the village on foot, especially for elderly and disabled people; (iv) the railway station and other commercial and residential properties have poor sight lines for access onto the A247 and difficulties in accessing the A247 from these properties will be exacerbated by increased traffic volume (and fewer “gaps” between cars); (v) the A247 is popular with cyclists and because of its narrow and winding nature the potential for accidents that additional traffic will cause is clear.
- The A247 may be an A-road on the map but in reality it is a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite;
(iii) the narrow section outside “Summers” which is regularly littered with the wing mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places. Larger vehicles routinely mount the (only) pavement to pass one another in the narrow sections.
- does not have continuous footpaths
- has a footpath only on one side of the road in long sections, including sections with pub, care home and church car park
- has several sharp bends
- has a hump-backed bridge with poor sight lines
- has other entrances with poor sight lines (eg Onslow Arms, church car park)
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times, more so when delays on the A3 are severe, which is common in the evening rush hours (4pm to 630pm) and summer weekends
- cuts through the Conservation Area of West Clandon within which 19 listed buildings are located with road frontage. A further 9 listed buildings are located on the A247 in West Clandon north of the Conservation Area.

The A247 is in reality a residential road with numerous bends, narrow sections and side-entrances. The road through West Clandon already has numerous accident black spots, such as: (I) the exit from Clandon station which has extremely poor sight lines due to a humped back bridge where numerous accidents have occurred; (ii) the exit from the Onslow Arms pub which is almost blind due to the pub building being adjacent the road - a vehicle has recently ended up in the garden of the cottage opposite; (iii) the narrow section outside “Summers” which is regularly littered with the wing
mirrors of cars which have made contact, as well as being a dangerous area for pedestrians due to vehicles mounting the pavement to try to pass; (iv) the winding section outside Clandon Regis and near the primary school which regularly suffers from demolition of gate posts and fences as vehicles leave the road; (v) the bend near West Clandon church which has seen damage caused to the flint wall in recent years.

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over, i.e. without a height restriction, the Guildford to Waterloo railway, north east of Guildford, which doesn’t involve travelling through the town centre and is already busy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6819</th>
<th>Respondent: 11114721 / Elizabeth Wilcockson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the scale of new building throughout the borough, which is disproportionate and unjustified;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6830</th>
<th>Respondent: 11114721 / Elizabeth Wilcockson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough. The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5689  Respondent: 11115201 / Philip Colinese  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? (  ), is Sound? (  ), is Legally Compliant? (  )

I object to Guildford Borough Council’s Draft Local Plan, June 2016. From consultation with others I have concluded that the Plan is unsound and unsustainable. My objections mainly relate to Housing Numbers, Infrastructure and Green Belt issues.

Housing: There is lack of evidence to support the alleged need for 693 new homes annually; double the previously quoted calculation and significantly higher than another independent estimate which I am aware of. That would mean about 40% of the total increase being built within a small radius of Burpham where I live. This, I believe, is disproportionately high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17409  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? (  ), is Sound? (  ), is Legally Compliant? (  )
Policy S2 states:

“During the plan period (2013-33), we will make provision for 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.”

The RHS are supportive of this strategy and the provision of new homes and employment land across the Borough from strategic, allocated and non-allocated sites. Wisley Village provides opportunities for new housing subject to policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1918  Respondent: 11149217 / Royal Horticultural Society (Sir or Madam)  Agent: Montagu Evans LLP (Montagu Evans)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We have prepared representations on behalf of our client, the Royal Horticultural Society (RHS), in response to the June 2017 Guildford Borough Proposed Submission Local Plan: Strategy and Sites (Reg 19). These representations should be read in conjunction with those dated 14 July 2016 submitted against the Proposed Submission Local Plan: Strategy and Sites (June 2016)) (see Appendix 1), submitted on the 22 September 2014 against the Local Plan Strategy and Sites Draft Local Plan (July 2014) and 27 November 2013 submitted against the Issues and Options Draft Local Plan (October 2013) (Appendix 2) in relation to both Wisley garden and village.

Background

As set out in previous representations, RHS Wisley is the flagship garden for the Royal Horticultural Society. The Society is the UK’s leading horticultural charity and for over 200 years has promoted the Science, Art and Practice of Horticulture. The reach of the RHS is very broad, encompassing gardeners, schoolchildren, the horticultural trade and the science community, all worldwide. These activities and principles have become embedded at RHS Wisley for over a century and the 1905 Laboratory building remains the focus for the Gardens. Surrounding this is approximately 200 acres of formal and informal gardens, glass houses and outbuildings. In addition, Wisley Village is largely owned by the Society and supports the operation of the Garden and in particular the Society’s educational activity by accommodating students and science activities through specialist research buildings and trial fields.

RHS Wisley is the top paid attraction within the Borough of Guildford and is the largest tourist attraction within Surrey, currently drawing in more than 1.2 million visitors a year, and targeted to rise to 1.4m by 2023. This is of national significance, compared with some 0.8 million at the Eden Project and 1.3 million at the Royal Botanic Gardens at Kew. The gardens are of international significance through its global reach and proximity to international airports at Heathrow and Gatwick. With some 400 staff and more than 200 volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the borough.

We suggest that the significance of the Society as a contributor to the Borough is given as much prominence in the Plan as for example Surrey University and Watts Gallery that are included. With the volume of staff and volunteers engaged at Wisley the site is a significant employer and generator of financial activity within the Borough.
The charitable purpose of the RHS is to inspire passion and excellence in the science, art and practice of horticulture. RHS Wisley is vital to the ability of the charity to deliver its purpose. The Garden is the most effective tool for educating the public (both adults and children) about horticultural skills for growing food and ornamental plants, science and environmental issues, as well as design It also acts as the base for all its public facing outreach work, including in local communities and schools.

The RHS has recently undertaken a comprehensive masterplanning process exploring the suitability of the existing ageing facilities and infrastructure at Wisley to meet the RHS’s longer term objectives as set out within the Masterplan Vision. This identified improvements to existing facilities at the Garden that are necessary to accommodate the projected increase in visitor numbers, and the Society has now embarked on a major investment at Wisley as part of a Strategic Investment Programme that is a step change to the Society’s charitable delivery and national profile. It is a pivotal moment for the RHS.

The following projects have been identified through the masterplanning process as being necessary to accommodate this growth at Wisley:

- Improvement to the garden entrance and retail facilities;
- Enhancement of the Laboratory building;
- A new National Centre for Horticultural Science and Learning;
- New office accommodation for a larger work and volunteer force;
- Improvement to the horticultural support (machinery yard and glass houses); and
- A new staff car park to avoid conflict with visitors.

This masterplan is now in the process of being implemented and the following planning applications have been consented:

- The Barn (application reference: 17/P/00796 (approved on 1 June 2016)) – New office accommodation;
- Hilltop (application reference: 16/P/00976 (approved on 30 September 2016)) – A new National Centre for Horticultural Science, and Learning;
- Front of House (application reference: 16/P/01080 & 16/P/01081 (approved on 30 September 2016)) - Improvement to the garden entrance and retail facilities and enhancement of the Laboratory building; and
- New Substations (application reference: 16/P/01037 (approved on 22 July 2016)).

The RHS want to ensure that the Local Plan supports the delivery of the masterplan for Wisley and the continual improvement of the Garden, for itself and as part of the local community. The GBC Proposed Submission Local Plan: Strategy and Sites Reg. 19 document forms the final consultation version of the GBC Local Plan following the consultation of the Proposed Local Plan Strategy and Sites Document in the summer of 2016.

Below we set out our representations on behalf of the RHS in response to the Proposed Submission Local Plan: Strategy and Sites document.

**Policy S2: Borough Wide Strategy**

Policy S2 states:

“During the plan period (2015-34), we will make provision for at least 12,426 new homes, 36,000 – 43,700 sq m of office and research and development (B1a and b) floorspace and 3.7 – 4.1 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs. The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.”

The RHS are supportive of this strategy and the provision of new homes and employment land across the Borough from strategic, allocated and non-allocated sites. Wisley Village and the RHS owned land there, provides opportunities for new housing subject to other policies within the plan. As part of the RHS strategy the village is now being managed to provide increased open market lettings that contribute to housing needs.
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or...
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes
from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clndon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2676  **Respondent:** 11166497 / CALA Homes Southern Home Counties (Sir or Madam)  
**Agent:** Vail Williams LLP (Jane Terry)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**SPATIAL VISION AND POLICY S2: BOROUGH-WIDE STRATEGY**

Reference should also be made to the HBF representation which, as members, we fully support.

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;
- This figure was then adjusted to include:
  - Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;
  - Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation; The Guildford Addendum Report, 2017 has been published
to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the Borough and that these should revert to the 2015 West Surrey SHMA figures.

Further, the NPPF which seeks to promote housing growth. Indeed one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:
‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

More specifically, it should:
‘Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’
The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/2677 | Respondent: | 11166497 / CALA Homes Southern Home Counties (Sir or Madam) |
| Agent: | Vail Williams LLP (Jane Terry) |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( No ) |
| is Legally Compliant? | ( ) |

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;

This figure was then adjusted to include:
• Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;

• Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;

The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the Borough and that these should revert to the 2015 West Surrey SHMA figures.

Further, the NPPF which seeks to promote housing growth. Indeed one of the Core Planning Principles at paragraph 17 of the NPPF states that planning should:

‘Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.’

More specifically, it should:

‘Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’

The effective use of such previously developed land will assist the local planning authority in meeting its objectively assessed housing needs and in so doing respond positively to wider opportunities for growth as required by the NPPF.

Duty to Cooperate

Reference is made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up
to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Co-operate can be considered to be appropriately discharged.

**Five-year Supply of Housing Land**

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on previously developed land this should be considered and an adjustment made to the proposed allocation sites accordingly.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s ‘Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

**Attached documents:**

---

**Comment ID:** pslp171/1526 **Respondent:** 11182849 / Ian Featherstone **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism. I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80). I object to the amended plan ignoring the government’s NPPF guidelines - “…… local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”. I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We act for Crimson Project Management. This representation relates to the SPATIAL DEVELOPMENT STRATEGY - Policy S2.

Our clients object to Policy S2 and to the accompanying Table 1 on the grounds that the proposed spatial strategy and the proposed allocations in respect of the provision of housing and educational facilities are inconsistent with the overarching strategic objective of delivering sustainable development and the presumption in favour of sustainable development that is set out at Policy S1.

In particular, the draft plan is deficient in not allocating a sustainable urban extension to Fairlands for a mixed use development comprising a new secondary school, housing, community and other local facilities whilst allocating sites for such uses which are demonstrably less sustainable.

Table 1 should be amended to include the sustainable extension to Fairlands as a village extension that will deliver up to 400 new homes within the next five years.

Please see also representations in respect of Appendix C - Infrastructure Schedule and Policy A46 - Land to the south of Normandy and North of Flexford and the comparative sustainability analysis that is contained in these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [POLICY S2_20160715134042.pdf](POLICY S2_20160715134042.pdf) (75 KB)

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Overall Housing Requirement

Since the previous consultation, the Council have reduced the overall housing target from 693 dwellings per annum (dpa) to 654dpa.

In support of our representations, Turley have produced a critique of the Council’s assessment of objectively assessed need and the associated evidence base.
The Turley report concludes that the Council’s updated OAN is not predicated upon a sound evidence base and fails to adequately assess demographic pressures or apply reasonable expectations in respect of job growth.

In addition, evidence is provided to demonstrate that the Borough suffers from acute housing affordability issues, such that a minimum uplift of 10% should be applied to the demographic projection of housing need to allow for market signals.

Consequently, the Turley report recommends that the Borough’s OAN should be revised to a minimum of 717dpa during the 19yr plan period (2015 to 2034), totaling **13,623 dwellings**. For the avoidance of doubt, this proposed level of growth is only to meet needs arising in Guildford.

There is a requirement to fulfil the duty to cooperate having regard to need to address Woking’s unmet housing need. Paragraph 4.6 of Guildford Borough Council’s Housing Delivery Topic paper (June 2017) identifies an unmet need for Woking totaling 3,150 dwellings in the 14yr period 2013/14 to 2026/27. This would result in an additional requirement in excess of the 7171dpa identified in Turley’s assessment (see below).

For these reasons, the proposed housing requirement is not justified upon appropriate evidence and is not effective or consistent with national policy by failing to meet the Borough’s overall market and affordable housing needs.

Unmet Need Elsewhere in the Housing Market Area
In addition to undertaking an assessment of the Borough’s true OAN, the Turley report considers the level of unmet need arising elsewhere in the Housing Market Area (HMA) that comprises Guildford Borough, Waverley Borough and Woking Borough.

As referenced above, Woking’s unmet housing need (the difference between Woking’s adopted Core strategy requirement and the OAN) is 3,150 dwellings for the period 2013/14 to 2026/27. Currently there is no plan-led strategy to meet this unmet need in so far as Woking is currently preparing a Site Allocations DPD to meet the housing requirement in the Core Strategy, not that set out in the SHMA.

The proposed submission version of the Guildford Borough Local Plan makes no allowance for Woking’s unmet housing needs, nor does the submitted Waverley Borough Local Plan (presently at examination). Both plans purport to meet their own OAN in full, without any provision for Woking Borough. Moreover, there is no intention from Woking Borough to undertake a plan review that accounts for this need.

It follows that there is substantial housing under provision elsewhere in the HMA and as a Green Belt authority with no advancing plan review, this trend in Woking Borough shows no sign of resolution in the short or medium term.

Given the clear requirement set out in the NPPF for any shortfall across a HMA to be considered on a ‘collective’ basis this issue cannot be underplayed. It should be remembered that NPPF paragraph 47 requires Council’s to ensure that their Local Plan meets full OAN for market and affordable housing in the entire housing market area, not only within their administrative area.

For the above reasons, there is a need for Guildford Borough Council to increase the housing requirement so to better respond to defined pressing needs for market and affordable housing both within Guildford Borough and the HMA.

As drafted the Proposed Submission Local Plan fails the positive preparation soundness test on this basis.

Within the West Surrey HMA, Guildford evidently exhibits the strongest housing market linkages with Woking when compared with Waverley e.g. the strongest commuting flow from Woking is to Guildford (West Surrey SHMA (Sept 2015) (Para 2.43)).

Given the close function relationship between Woking and Guildford, it is logical to expect Guildford Borough to accommodate a greater percentage of Woking’s unmet need than might be expected to be met in Waverley which is located to the south of Guildford.
On this basis, we are of the view that Guildford Borough should accommodate at least 50% of Woking’s unmet housing needs. This means accommodating an additional 1,575 dwellings in Guildford Borough (Woking’s unmet need of 3,150 dwellings x 50%).

We therefore consider that the overall proposed housing requirement should be revised to make provision for at least 15,198 new dwellings (13,623 + 1,575) (800dpa (rounded)) over the plan period 2015 to 2034.

Proposed Phasing of the Housing Requirement

Paragraphs 6.27 to 6.31 of the Turley report consider the point at which the need for housing occurs within Guildford Borough during the course of the plan period.

Figure 6.1 of the Turley report demonstrates that the sharpest projected household growth in the plan period occurs in the first five years of the plan period (2015-20). This growth then declines throughout the plan period such that it is at its lowest level at the end of the plan period. Conversely, the Council is proposing a phased annual housing target that increases from 450dpa to 850dpa over the lifetime of the plan.

We have reviewed the position and even on an annualised basis, applying the Council’s unsound 654dpa requirement, page 8 of the Council’s Land Availability Assessment (“LAA”) (June 2017) show that the deficit in supply accumulated from the 2015 base-date of the plan period will not be addressed until 2025. This is wholly illogical and will result in a failure to meet housing needs for the first 10 years of the plan period and represents the antithesis of boosting significantly the supply of housing land which position is articulated at paragraph 47 of the Framework.

The above approach is inconsistent with the NPPF and Housing White Paper that require LPA’s to significantly boost the supply of housing now. This is especially relevant in Guildford Borough, that forms a Borough that has been the subject of a long standing housing land supply deficit and has persistently under delivered against identified needs. Consequently we object to the notional annualised housing targets included at in the table included at the bottom of Policy S2, on the basis this approach is inconsistent with national policy and is not justified by failing to reflect the clear evidence that the greatest housing need occurs early on in the plan period.

Five Year Housing Land Supply

Before commenting specifically upon the Council’s proposed housing distribution, we note there is a need for the plan to demonstrate a five-year housing land supply on the date of adoption. Any failure to secure this comprises an issue of soundness in respect of compliance with NPPF paragraph 47 and the objective of significantly boosting the supply of housing land and the requirement to demonstrate a five year supply.

The importance of demonstrating a 5 year housing land supply upon adoption, in order to achieve a sound plan, was noted by an EiP Inspector in examining the Canterbury District Local Plan:

‘The Framework indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5-year supply of deliverable sites. As such, I consider that the Plan would be ineffective and not accord with national policy. It would therefore be unsound unless this can be remedied’.

We have commented above that the proposed housing requirement needs to be increased to 15,198 dwellings (800dpa) and that the proposed phased housing target approach is unsound. However, and even if one assesses the Council’s proposed phased housing requirement (from Policy S2) against the Council’s housing trajectory at page 8 of the Council’s Land Availability Assessment (Addendum) (June 2017), it is evident that the Council will not meet the cumulative phased housing requirement until target until 2024/2025 (there is an error in the entries in the penultimate row of the table on pg8 of the Council’s Land Availability Assessment (Addendum) (June 2017)).

On the basis of the Council’s phased housing requirement (which approach relies upon a lower target in the first seven years from the anticipated date of adoption (2019 onwards) completions will be significantly below the artificially constrained phased housing requirement until 2024/25.

At the rate of completions assumed by the Council, the cumulative deficit would extend further into the plan period if the unsound phasing of the housing requirement were corrected and the 654dpa annualised target was to be used for
monitoring purposes. In addition, any uplift in the OAN to take account of the representations made, including the assessment undertaken by Turley, would compound the position yet further.

We illustrate the position against the Policy S2 phasing approach in Table 1 below:

[Table 1]

The position set against an annualised 654dpa on the basis of the Council’s derived OAN of 12,436 dwellings during the 19 year plan period is set out in Table 2 below:

[Table 2]

Table 2 shows a cumulative shortfall of 856 dwellings against the 654dpa annualised target within the first 10 years of the plan. Of particularly concern is that the cumulative target is not met until 2029/30. This further emphasises the flawed approach to housing delivery in so far as current needs won’t be met, on the Council’s trajectory for 12 years. The position is even more stark when one applies the Turley OAN of 717dpa or the 800dpa taking into account Woking’s unmet need.

In light of the above findings it is clear that a material housing land supply deficit occurs upon adoption of the Plan and will be sustained for a long time into the plan period. On the basis of the foregoing, the Council is not able to demonstrate a five year supply of deliverable housing land on adoption of the Plan.

Housing Delivery

It is therefore essential that the Plan identifies sites that can deliver within the early part of the plan period in order to secure the soundness requirement to demonstrate a 5-year housing land supply upon adoption. This becomes yet more essential when one considers the past under delivery in the Borough. the resulting impact from this sustained under delivery, is reflected in the Turley evidence (Figure 6.1) that confirms the need for housing is most pressing in the early years of the plan period.

A further consideration of particular standing is that the above positions reflect the Council’s delivery assumptions, which relies upon unreasonable assumptions relating to the delivery of the strategic sites, including Slyfield (A24), Gosden Hill (A25), Blackwell Farm (A26); and Former Wisley Airfield (A35).

Given the inherent difficulties in securing the requisite infrastructure funding and provision for these sites, in particular improvements to the A3 (including new junctions) as well as, in the case of Slyfield, the need to find a site and deliver a new waste treatment works, we are of the view that the trajectories for these sites are too optimistic and unrealistic.

Setting aside our objections to the Wisley Airfield site as a matter of principle, even delaying these sites by only two monitoring years would see the loss of 1,360 dwellings from the Council’s purported supply. This demonstrates the lack of flexibility in the plan to deal with changing circumstances.

We are aware that as a Green Belt constrained authority and one that has failed to have an up to date development plan for many years, the Borough faces a significant challenge in reversing this historic under delivery early on in the plan period. However, it is essential that this under delivery (I.e. the green line illustrated in the LAA above) is rectified as early on in the plan period as possible.

We note that the Borough’s current Local Plan became time expired in 2006. It follows that the Council have failed to plan for housing growth in a proactive plan led manner for over a decade. This is the reason for such substantial under delivery over the past decade and the resulting need for housing in the early part of the plan period, which position we say is acute.

The Borough’s failure to produce an up to date Plan over this period must not be used as justification to delay housing delivery until the latter part of the plan period. Consequently there is an essential need to review whether a revised spatial strategy would enable a greater level of housing delivery in the first 5-10 years of the proposed plan period.

Part of the necessary solution is to identify sites that can provide material boosts to the overall deliverable supply within the immediate five year period. Presently the plan is overly reliant upon sites that have significant lag times associated
with them. Our client’s proposal (see representations below) would enable two or more sales outlets to be established on the Normandy/Flexford (Policy A46) site with completions at approximately 60+dpa per outlet.

If one were to apply a base date of say 2019 (from anticipated adoption of the Plan), a minimum of 300 dwellings could be delivered at the Normandy/Flexford site within the 5 year period to 2024. Such deliverability is achievable in part due to the site’s greenfield nature and the fact that it is controlled by an established national housebuilder.

Proposed Changes: Increase the housing target to a minimum 15,198 (800dpa) dwellings over the plan period 2015 to 2034.

Removal of the ‘annual housing target’ table at the bottom of Policy S2.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Housing Needs in Guildford.pdf (811 KB)
- 2516_09_A_Green Belt Review.pdf (2.5 MB)
- SANG Location Plan.pdf (8.0 MB)
- 2516_121_B_Concept Masterplan_Wanborough Station Site.pdf (861 KB)
- 2516_110_F_Landscape-Led Masterplan_email.pdf (1.6 MB)
- 2516_110_D_Concept Masterplan_Email.pdf (1.5 MB)
- 2516_120_A_Centurion Masterplan_Great Westwood Site.pdf (814 KB)
- 2516_122_B_Centurion Masterplan_Combined Sites.pdf (1.6 MB)
- Letter_to_LPA__LP_Reps__TW_Normandy__FINAL_Signed__24_July_2017.pdf (386 KB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

A modified target of 12426 houses still does not reflect local need or conditions.

Conversely changing the target based on a SHMA document which remains unexplained adds to the accusation that the number is made up, rather than calculated based on a clear set of assumptions.

Guildford is a town of 70000 residents, and we have a University of 14000 students. Under any definition that is a monopoly. The affect this has had on the town, and housing is dramatic.

Guildford residents association (GRA) have employed a professional analyst (Neil MacDonald), and I would defer to his report and conclusions, on numbers and lack of transparency.

https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf

We should NOT be taking unfulfilled housing needs form Woking and Waverly. We have no space for our own.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1) Introduction:

1. This paper sets out representations on behalf of Bewley Homes Plc (“Bewley”) in respect of Guildford Borough Council’s proposed submission draft Local Plan Regulation 19 consultation (“the Plan”).
2. For ease and consistency these representations are presented in two parts. The first part sets out Bewley Homes’ representations in relation to the Plan as drafted. The second part (see separate volume) provides detail on a proposed alternative housing site that Bewley considers should be allocated at part of the Local Plan to ensure the Council meets its housing obligations over the plan period.
3. The individual components of the plan are identified throughout where comments are being made. A separate consultation response proforma has been prepared for each individual representation and is submitted alongside this document.
4. In terms of format the remainder of this document identifies the relevant paragraph or policy reference within the proposed submission document where representations are being made and confirms whether Bewley is raising objection or support together with which soundness tests or legal compliance issues are being raised.

2) Spatial Planning Context and Housing Delivery

1. As a starting point it is considered important to set the background against which the current draft Local Plan is being prepared within Guildford Borough.
2. The current adopted Local Plan was adopted on 09 January 2003 and provided a planning framework for the period up to 2006. The adopted Local Plan is therefore time expired and has been so for a period of 10 years.
3. The Council’s progress on the preparation of a new Local Plan over this 10 year period has been woefully inadequate. As a consequence of the vacuum created by a lack of up-to-date policy within the Borough the Council’s capability to maintain an adequate supply of deliverable housing land has been severely hampered.
4. Until recent years and, in particular the publication of its Strategic Housing Market Assessment in 2014, the Council has not even been in a position to confirm the state of its housing land supply shortfall.
5. The Council’s current stated housing land supply position set out in its Annual Monitoring Report dated October 2015 confirms that it has at best a 2.4 year supply with a 20% buffer.
6. This extremely low level of supply is also only based on an assessment base date of 2013 i.e. it fails to take on board the persistent history of failure over the preceding years since the expiry of the previous Local Plan in 2006.
7. The reason for highlighting the matter of the Council’s extremely poor record in terms of both plan making and housing delivery is that any new Local Plan should place its emphasis not only on seeking to meet the full Objectively Assessed Needs (“OAN”) identified for the Borough but should also look to ensure that a significant proportion of that requirement is supplied in the early years of the plan period.
8. This approach is further reinforced by the upward trend in need that is demonstrated by the most recent population data published by the Office of National Statistics (ONS) on 26 May 2016 in relation to migration trends. This data has identified that net long term migration is now at its highest in the UK for over 10 years at +333,000. Whilst this does not specifically confirm that further housing will be required in Guildford Borough it is a clear indication that the pressure for new housing across the UK and in the South East region in particular will continue to increase.
9. It is this kind of symptom that the Government is seeking to treat through its National policy requirement to significantly boost the supply of new housing and a focus on the presumption in favour of sustainable development.
10. Furthermore the Council’s position in terms of affordable housing need as confirmed in its October 2015 SHMA increases the importance of the timely delivery of housing across the Borough. The SHMA records a need of some 456 dpa for affordable housing, which equates to 66% of the total OAN of 693 dpa.
11. With this background in mind the remainder of this section of the representations provides specific comments on the various paragraphs and policies within the Plan.

Paragraph 1.3 – OBJECT: UNSound – Not Positively Prepared, Justified or Consistent with National Policy:

12. The Council states in this paragraph that the Plan contains overarching policies and allocates land for housing, employment, community facilities and other types of development. It goes on to state that the second part of the Local Plan (which is yet to be prepared) will deal with the detailed development control policies.

13. On that basis it is incumbent upon the Council to ensure that the Plan does indeed allocate all land that is necessary to meet its housing and other development obligations.

14. For the reasons that Bewley has set out in this document it is clear that there are fundamental flaws in the Plan as drafted as well as a number of the strategic land allocations that will result in the document both being unsound and unable to meet the development needs of the Borough.

15. The approach the Council is taking in dealing with all land allocations in the Plan is laudable but does therefore mean that there are no second chances in terms of meeting any shortfall created by the failure of any one or a number of its land allocations within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- DN.Guildford LP.Reg 19.Representations on behalf of Bewley Homes Plc.Part 1.FINAL.pdf (236 KB)
- DN.Guildford LP.Reg 19.Representations on behalf of Bewley Homes Plc.Ash.FINAL.pdf (342 KB)

Comment ID: PSLPP16/17285   Respondent: 11458241 / Bewley Homes   Agent: Bewley Homes Plc (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 – OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:

Bewley is supportive of the fact that the Council is seeking to plan for the whole of its OAN as identified in the October 2015 version of its SHMA. This is the correct approach to take and is in conformity with National policy set out in the Framework (Paragraph 47) and the NPPG in the circumstances where, as is the case in Guildford Borough, the level of constraints do not justify a reduction in delivery against the OAN.

The above positive point within the policy is however offset by the housing trajectory set out in the table that forms part of the policy wording. It is clear that the Council is continuing with its trend of ‘putting off this year what can be dealt with in future years’.

Given the historic failure of the Council to deliver housing over a sustained period in the 10 years between the expiry of the old Local Plan and the present day and the extremely low level of supply currently in place the Council should be seizing the opportunity afforded by the new Local Plan to proactively deliver housing in the early years of the plan period.

The current trajectory seeks to push the majority of the housing delivery for the Borough in the second half of the Plan period i.e. from 2023 onwards. In fact the trajectory does not provide any delivery figures at all for the first five years of the plan period from 2013 – 2018.
The Council is therefore embarking on a strategy that will push back delivery of much needed housing to the later stages of the plan period.

This approach, which is predicated on the delivery of major development locations that are by their nature slow to deliver, will further exacerbate the current shortfall in supply and fail those most vulnerable members of the community in need of affordable housing. Additionally the major development locations identified by the Council all have significant constraints that need to be addressed before any new dwellings can be delivered.

Whilst the Council has identified that its housing requirement is ‘not a ceiling’ and that earlier delivery of allocated sites will be supported where appropriate such a reliance on the ‘hope’ that sites will come forward rather than positively planning for early delivery is simply unacceptable and fails to meet the test of being positively prepared and in conformity with National policy.

The Council’s development strategy for the delivery of new housing across the Borough is therefore inherently flawed and either a significant change is required that moves away from major development locations or further land is allocated to enable delivery in the early years of the plan period whilst the major development locations come up to speed.

In either scenario further land allocations should be made in sustainable locations, which the Council’s evidence base already confirms are available (see representations below).

It is perhaps rather telling that the Council is aware of the significant shortcoming in its development strategy for the delivery of housing by the fact that Policy S2 is the only policy in the document that is not supported by a reasoned justification. This in Bewley’s view is because there is no reasoned justification for the development strategy the Council is seeking to pursue in the face of the clear and compelling evidence that housing should be prioritised in the early years of the plan and that capacity exists in locations that are capable of delivering in a sustainable manner.

Bewley Homes’ concerns with the delivery strategy that the Council is pursuing are supported by the conclusions of the Sustainability Appraisal (“SA”) undertaken by AECOM to support the Plan. In particular the SA notes (Page 9 of the Non-Technical Summary and Second paragraph of Page 29 of the main SA document refer) that there are question marks regarding the housing trajectory (and in particular the supply of housing in the early part of the plan period). The SA goes on to state that these are detailed matters that will benefit from open discussion during the plan’s examination.

The approach advocated by the SA to leave the debate on delivery until the examination is itself fundamentally flawed. The Council should be in a position where it progresses to the submission stage with a Plan that can deliver the required level of housing consistently across the plan period without any ‘question marks’. Given the significant shortfall in supply currently and the backlog of unmet need in the District certainty of delivery in the early years is paramount to the success of the Plan.

The ‘question mark’ identified by the SA on its own is enough to demonstrate that the Plan fails the tests of soundness and cannot proceed to examination.

The development strategy should therefore be changed to ensure that housing is being proactively delivered in the early stages of the plan period rather than the current approach that will reinforce the Council’s position in terms of failing to deliver.

The housing requirement identified (693 dpa) must be regarded as a minimum and draft Policy S2 must be amended to clearly state this. In addition the Council should be allocating further land on small to medium sized sites that can deliver in the short term to address its significant backlog in need and to rectify the current shortfall in housing land supply. Given the Council’s persistent failure to deliver new housing over the last decade or more the very least that the Council should be planning for is a 20% buffer over and above the total housing requirement generated by the OAN. The SA report currently confirms the Council is planning for a 14% buffer, which is inadequate and, will lead to failure.

A minimum requirement of 832 dpa should therefore be planned for by the Council, which would equate to a total requirement of 16,640 dwellings over the 20 year plan period i.e. an increase of 2,780 dwellings.

Allocation of these additional dwellings on small to medium sized sites, such as that promoted by Bewley Homes, will provide the necessary flexibility to ensure that the Council can maintain a rolling 5 year supply of deliverable housing
sites and most importantly that it will deliver housing in the early years of the plan period to help rectify the significant backlog of unmet demand.

**Table 1 - OBJECT: UNSOUND – Not Positively Prepared, Justified or Consistent with National Policy:**

Bewley Homes objects to the Council’s inclusion of a windfall allowance within Table 1 equating to 625 dwellings over the period 2018 – 2033.

Given the Council’s history of persistent failure to deliver housing it is considered that any reliance upon windfalls in the Plan is unsound. The Council should be planning positively to ensure that sufficient land is identified to meet its OAN as a minimum and should not be relying upon windfalls to make up the numbers where the history of delivery has been so poor.

It is considered that windfalls should therefore be removed from Table 1 and regarded as an additional ‘bonus’ over and above the planned delivery to meet the minimum OAN.

This approach would accord with Government policy contained in the Framework at Paragraphs 47 and 48 and supplemented by the advice in the NPPG at Paragraph: 24 Reference ID: 3-24-20140306.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- [DN.Guildford L.P.Reg 19.Representations on behalf of Bewley Homes Plc.Part 1.FINAL.pdf](#) (236 KB)
- [DN.Guildford L.P.Reg 19.Representations on behalf of Bewley Homes Plc.Ash.FINAL.pdf](#) (342 KB)

Comment ID: PSLPP16/17368  Respondent: 11458241 / Bewley Homes  Agent: Bewley Homes Plc (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Detailed Representations in Relation to Effingham**

Having provided representations in relation to the Plan as drafted and the accompanying SA (see Part 1 of Bewley Homes’ representations) this section sets out Bewley Homes’ proposal for the allocation of land at Hester’s Yard, Wood Street Village as a sustainable location immediately adjacent to the settlement. The proposal is supported, where relevant, by appropriate detailed technical evidence primarily in relation to the following matters:

- Landscape and Visual Impact and Green Belt HDA
- Highways and Transportation Matters Motion

As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Wood Street Village as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.

This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.
Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

As set out in Part 1 of Bewley Homes’ representations the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided not to make any provision for growth to meet the needs of the community at all throughout the plan period within Wood Street Village.

The Council’s approach in this regard is without foundation and based on flawed evidence.

As demonstrated in the attached appraisals (and explored below) land at Orestan Lane represents a viable location for a relatively limited release of land from the Green Belt to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

As identified in Part 1 of Bewley Homes representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Wood Street Village, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Wood Street Village in terms of meeting their needs for further open market and affordable housing.

As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Wood Street Village is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban Area of Guildford, Ash and Tongham. Wood Street Village is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.

Turning to consider Bewley Homes promotion site. Land at Orestan Lane, Effingham is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Wood Street Village and the front section of the site is actually within the settlement and benefits from a direct road frontage onto Oak Hill. As set out above Wood Street Village comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is reflected in its desire to roll back the Green Belt boundaries in the Plan.

The promotion site itself comprises a variety of commercial uses including open storage, vehicle repairs and servicing. The site is predominantly previously-developed land in accordance with the definition set out in Annex 2 of the Framework.

Given the emphasis that the Council is placing upon the release of previously-developed land to meet its housing requirement this promotion site is considered to comprise just the kind of location that should be allocated in accordance with Paragraph 4.1.6 of the Plan that states:

> Our preference is to focus growth in the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).

In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion.
Contribution to Green Belt and Landscape and Visual Impact:

Having established that Wood Street Village is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Wood Street Village. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 2.

In summary the review concluded the following:

‘This review provides a clear indication that the site is entirely suitable for extraction from the Green Belt, without resulting in any adverse effects on the Green Belt function as identified within the NPPF, or on the local landscape character or the amenity of local visual receptors. This results primarily from the clearly demarcated boundary features, existing commercial uses within the site, the enclosed nature of the site and the consequential limitation in landscape and visual effects, but also the way in which the site is severed from the key area providing openness between Wood Street Village and Fairlands.

A development which seeks to address the constraints of the site, would contribute to retaining the openness of the Green Belt by providing much needed housing on a site where Green Belt function would not be comprised, whilst also providing a sustainable and high quality development which links very well to the existing village.’

It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

Transport and Highway Impacts:

In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Oak Hill in accordance with the requirements set out in Manual for Streets.

The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

The site is therefore sustainably located in relation to existing services and facilities within the settlement of Wood Street Village.

Flooding and Drainage:

The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

Other Technical Considerations:

Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.
The Approach to Allocation – Presumption in Favour of Sustainable Development:

Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

Economic – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site

Social – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere

Environmental – It has been demonstrated through the detailed review undertaken by HDA that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

For all of the above reasons it is considered that Land at Orestan Lane, Effingham comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Orestan Lane, Effingham comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement and removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Introduction:

1.1 This paper sets out representations on behalf of Bewley Homes Plc (“Bewley”) in respect of Guildford Borough Council’s proposed revised submission draft Local Plan Regulation 19 consultation (“the Plan”).

1.2 For ease and consistency these representations are presented in two parts. The first part sets out Bewley Homes’ representations in relation to the Plan as drafted. The second part (see separate volume) provides detail on a proposed alternative housing site that Bewley considers should be allocated at part of the Local Plan to ensure the Council meets its housing obligations over the plan period.

1.3 The individual components of the plan are identified throughout where comments are being made. A separate consultation response proforma has been prepared for each individual representation and is submitted alongside this document.

1.4 In terms of format the remainder of this document identifies the relevant paragraph or policy reference within the proposed submission document where representations are being made and confirms whether Bewley is raising objection or support together with which soundness tests or legal compliance issues are being raised.

2.0 Spatial Planning Context and Housing Delivery

2.1 As a starting point it is considered important to set the background against which the current draft Local Plan is being prepared within Guildford Borough.

2.2 The current adopted Local Plan was adopted on 09 January 2003 and provided a planning framework for the period up to 2006. The adopted Local Plan is therefore time expired and has been so for a period of 11 years.

2.3 The Council’s progress on the preparation of a new Local Plan over this 11 year period has been woefully inadequate. As a consequence of the vacuum created by a lack of up-to-date policy within the Borough the Council’s capability to maintain an adequate supply of deliverable housing land has been severely hampered.

2.4 Until recent years and, in particular the publication of its Strategic Housing Market Assessment initially in 2014, the Council has not even been in a position to confirm the state of its housing land supply shortfall.

2.5 The Council’s current stated housing land supply position set out in its Land Availability Assessment (“LAA”) Addendum April 2017 states that it has at best a 2.3 year supply with a 20% buffer. This compares with the position in 2016, which was at best a 2.4 year supply with a 20% buffer. The Council’s poor record in terms of housing delivery has therefore worsened during the course of the last monitoring year and since the initial Regulation 19 version of the Local Plan was published.

2.6 This extremely low level of supply is also only based on an assessment base date of 2013 i.e. it fails to take on board the persistent history of failure over the preceding years since the expiry of the previous Local Plan in 2006.

2.7 The reason for highlighting the matter of the Council’s extremely poor record in terms of both plan making and housing delivery is that any new Local Plan should place its emphasis not only on seeking to meet the full Objectively Assessed Needs (“OAN”) identified for the Borough but should also look to ensure that a significant proportion of that requirement is supplied in the early years of the plan period. The current approach set out the Plan does the exact opposite by including a stepped trajectory that pushes delivery back to the later years of the plan period predicated on the long lead in times from a number of strategic locations.

2.8 This approach is further reinforced by the upward trend in need that is demonstrated by the most recent population data published by the Office of National Statistics (ONS) in February 2017 in relation to migration trends. This data has identified that net long term migration remains high at a level of +273,000. Whilst this does not specifically confirm that further housing will be required in Guildford Borough it is a clear indication that the pressure for new housing across the UK and in the South East region in particular will continue to increase.

2.9 It is this kind of symptom that the Government is seeking to treat through its National policy requirement to significantly boost the supply of new housing and a focus on the presumption in favour of sustainable development.
2.10 Furthermore the Council’s position in terms of affordable housing need as confirmed in its March 2017 SHMA Addendum increases the importance of the timely delivery of housing across the Borough. The SHMA Addendum records a need of some 517 dpa for affordable housing, which equates to 79% of the total OAN of 654 dpa. This position has worsened significantly from that set out in the Regulation 19 consultation version of the Plan in 2016. The 2016 version identified 456 dpa for affordable housing, which equated to 66% of the total OAN of 693 dpa set out at that time.

2.11 With this background in mind the remainder of this section of the representations provides specific comments on the various paragraphs and policies within the Plan.

Uplift for Student Accommodation Requirements:

2.33 Linked to the presence of the University of Surrey the Addendum report includes an uplift for specific student accommodation. Bewley does not dispute this uplift or the need for it.

Unmet Need in the HMA – Duty to Cooperate:

2.34 The Addendum report makes no reference to unmet need in the HMA and certainly makes no adjustment to the OAN to reflect unmet need.

2.35 Within the HMA there is a substantial unmet need equating to 3,150 dwellings arising from Woking.

2.36 This level of unmet need is acknowledged to exist by the Council in Box 6.8 (Page 27) of its Sustainability Appraisal (“SA”).

2.37 At the recent Examination Hearings for the Waverley Borough Local Plan that concluded on 06 July 2017 the Inspector was presented with clear and unequivocal evidence (see Statements attached at Annex 1) that Woking was unable to deal with any of its unmet need in the current plan period and that in fact its unmet need would be likely to rise during the course of the next plan period due to the level of environmental constraint imposed on the Borough.

2.38 Guildford also sought to advance a case that it would be unable to deal with any of Woking’s unmet need. The Waverley Local Plan Inspector dismissed Guildford’s arguments and expressly concluded that Guildford would need to take ‘its fair share’ of Woking’s unmet need.

2.39 The Inspector went on to conclude that Waverley Borough should take 50% of the unmet need arising from Woking equating to a total 1,575 dwellings over its 19 year plan period i.e. an annual uplift of 83 dpa to its housing requirement.

2.40 This leaves a shortfall of 1,575 dwellings to be dealt with in the HMA. In the absence of any other LPA in the HMA and the fact that Guildford has failed so far to even consider taking any unmet need Bewley Homes considers that as a starting point the whole 1,575 dwellings should be provided in the Plan.

2.41 The current Plan period extends from 2013 – 2034 i.e. 21 years. The remaining unmet need from Woking of 1,575 dwellings therefore equates to an annual uplift of 75 dpa.

2.42 This is considered an entirely reasonable approach to take bearing in mind the clear Government policy set out in Paragraph 47 of the Framework that requires LPAs to meet the entire objectively assessed needs of the HMA in their Plans. Impact in Terms of Duty to Cooperate:

2.43 The Council’s Duty to Cooperate Topic Paper (“DTC”) notes at Paragraph 4.41 the unmet need arising from Woking equating to a total of 3,150 dwellings. The DTC also references a Memorandum of Understanding between the three constituent local planning authorities in the HMA (Woking, Guildford and Waverley), which states that the authorities will continue future joint working to ensure as far as possible that the housing needs across the HMA are met.

2.44 The Memorandum of Understanding was never signed by all three authorities.

2.45 Furthermore its content does not reflect the current approach being taken by Guildford Borough in relation to the calculation of its OAN that sets a lower figure than the previous iteration of the SHMA. Equally the Memorandum of
Understanding is apparently at odds with the express evidence presented by all three authorities to the Waverley Local Plan Examination. It is therefore considered that the weight to be attached to this document is extremely limited.

2.46 The DTC continues at Paragraph 4.50 to state that the Council does not consider it can sustainably accommodate any unmet need arising from Woking. This is indicative of the flawed approach the Council has taken because it must first calculation its OAN to meet the needs in the HMA including any unmet need arising from Woking and then test that OAN against the sustainable capacity of the Borough. Put in simply terms the Council has failed to do this.

2.47 Equally Bewley Homes considers the Council has completely failed in its legal obligation under the Duty to Cooperate because there is a clear unmet need arising from Woking that both the Council and the adjoining authority Waverley are protesting cannot be met. Yet neither authority has properly sought to test whether this unmet need (or a proportion of it) can be met. The communication between the three constituent authorities in the HMA appears to be at odds with the Memorandum of Understanding and fails to properly address the needs of the HMA. Consequently the Duty to Cooperate is not complied with in this instance.

Calculation of correct Housing Requirement:

2.48 Based on the above representations it is clear that the Council’s calculation of its housing requirement as based on the 2017 SHMA Addendum is incorrect. The correct calculation of housing requirement for the Borough against which the Plan should be prepared is summarised below:

<table>
<thead>
<tr>
<th>dpa</th>
<th>Running Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Population projections</td>
<td>577</td>
</tr>
<tr>
<td>Uplift for Market Signals of 25%</td>
<td>144</td>
</tr>
<tr>
<td>Uplift for Employment</td>
<td>2</td>
</tr>
<tr>
<td>Uplift for Student Accommodation</td>
<td>23</td>
</tr>
<tr>
<td>Unmet Need in HMA – 50% of Woking</td>
<td>75</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>821</strong></td>
</tr>
</tbody>
</table>

2.49 The figure currently set out in the Plan of 654 dpa falls well short of the actual requirement for the Borough based on the clear evidence and Government policy/advice on the most appropriate way of calculating OAN together with the importance of meeting all housing need in the HMA.

2.50 Over the 21 year Plan period the above annual requirement equates to 17,241 dwellings, which is an uplift of 3,500 dwellings over the Plan period when compared with the current requirement in the Plan.

2.51 A similar level of uplift appears to have been tested through the Council’s SA under option 8, which unsurprisingly scores the best in terms housing delivery (Table 7.3 on Page 39 of the SA refers). Option 8 only scores low in relation to ecology, landscape and transport all of which are matters that can be addressed via appropriate mitigation delivered by new development and should not therefore be seen as constraints to the provision of the correct housing requirement for the Borough. Further comments on the SA are set out in Section 3 below.

2.52 Bewley notes that the draft policy refers to the housing requirement as a minimum through the use of the wording ‘at least’, which is supported and should be retained alongside any uplift to the current draft figures.

2.53 In the current national policy climate where Government policy and guidance clearly places an emphasis on significantly boosting the supply of new housing it is vital that housing requirement policies in Development Plans are identified as minima rather than maxima.

Stepped Trajectory:
2.54 The current draft wording for Policy S2 includes a stepped trajectory that seeks to push a significant proportion (some 6,800 dwellings) into the period 2025 – 2034. Furthermore the trajectory only commences in 2019 and therefore excludes the period 2013 – 2018. As a consequence the ‘Annual Housing Target’ table only shows a total provision of 9,810 dwellings, which is nowhere near the full requirement even when using the Council’s annual figure of 654 dpa. The sentence in Paragraph 4.1.9a is therefore wrong.

2.55 Aside from the clear factual inaccuracies in the wording of the table and the accompanying text the Council’s use of a stepped trajectory has the direct affect of pushing back delivery to the later years of the Plan period. This approach is at odds with clear Government policy and guidance for the following reasons:

· Reason 1 – The Council has a clear and present need for new housing delivery now as expressed in its significant 5-year housing land supply shortfall;
· Reason 2 – The Council has a persistent history of under provision as evidenced in its Annual Monitoring Reports and confirmed by its voluntary acceptance of the 20% Buffer;
· Reason 3 – The affordability ratio in the Borough is one of the highest in the Country making Guildford Borough one of the least affordable places to live;
· Reason 4 – The affordable housing need in the Borough is massive and cannot possibly be met by the current policy approach and suggested housing requirement;
· Reason 5 – The delays in the delivery of acceptable and sustainable developments have primarily been due to Member intransigence opposing otherwise appropriate development; and,
· Reason 5 – Delay to the delivery of housing in the Borough will only serve to worsen the current housing shortfall.

2.56 The Council’s argument in Paragraph 4.1.9a that the stepped trajectory is necessary because of the likely delivery rates on the strategic greenfield sites is a demonstration that its spatial delivery strategy is flawed and that as a consequence more smaller sites need to be allocated to balance the delivery trajectory. The Council has not properly assessed this approach nor has it sought to plan positively to address identified constraints to the delivery of sufficient sites such that an even trajectory can and should be delivered.

2.57 There is in Bewley Homes’ view no sound reason for taking the approach the Council has in terms of a stepped trajectory that will only serve to make an appalling record of housing delivery worse.

2.58 As confirmed by Sajid Javid in his recent LGA speech: ‘Where housing is particularly unaffordable, local leaders need to take a long, hard, honest look to see if they are planning for the right number of homes.’

2.59 In Bewley Homes’ view this Council has not yet take that long, hard, honest look to ensure that it is planning for the right number of homes and at the right time. The current Plan strategy is flawed and if progressed to Examination will fail the tests of soundness in terms of not being positively prepared, not consistent with National policy, Not justified and potentially in relation to unmet need would fail in the duty to cooperate.

Five Year Housing Land Supply:

2.60 The starting point for the current consultation in terms of 5-year housing land supply is set out in the April 2017 LAA, which identifies at best 2.3 years supply with the inclusion of a 20% buffer. The Council’s starting position is therefore one of a significant shortfall and an acknowledgement of persistent failure in terms of delivery.

2.61 When this starting point is compared with the proposed development strategy and the use of a stepped trajectory that pushes back supply to the later stages of the plan period due to the over reliance on a small number of strategic allocation sites, the Council’s 5-year housing land supply position is only set to worsen. In short the Council’s current approach is set up to fail immediately upon the adoption of the Local Plan.

2.62 The consequence of this approach is that Paragraphs 14 and 49 will continue to be engaged and the policies for the supply of housing in the newly adopted Local Plan will immediately be rendered out-of-date. Setting up a Local Plan to fail in this way is unsound and flies in the face of the plan led system advocated by Government and set out in Statute (S38(6) 2004 Act).
2.63 The Council’s housing delivery trajectory set out in the table on Page 8 of the LAA Addendum (June 2017) confirms that the only way the Council comes close to demonstrating a 5-year supply is with the use of a stepped trajectory and reliance on sites that fail to meet the Footnote 11 test, as confirmed by the fact that the Council’s 5-year supply assessment set out in the table on Page 12 of the LAA Addendum contains different (and lower) annual supply figures. When the correct OAN is applied and the stepped trajectory removed combined with the extremely low supply starting point it is clear the Plan trajectory will fail to sustain a rolling 5-year supply.

2.64 The table below summarises the clear discrepancies in the Council’s approach when either the table on Page 8 or Page 12 of the LAA Addendum is used. In both cases the Council’s position confirms it has set the Plan up to fail in terms of 5-year supply. This is at odds with the Framework and the NPPG in particular Paragraph 033 Reference ID: 3-033-20150327:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>LAA Page 8</td>
<td>310</td>
<td>309</td>
<td>576</td>
<td>773</td>
<td>771</td>
<td>2,739</td>
<td>4,681</td>
<td>2.9</td>
</tr>
<tr>
<td>LAA Page 12</td>
<td>310</td>
<td>309</td>
<td>531</td>
<td>531</td>
<td>329</td>
<td>2,210</td>
<td>4,681</td>
<td>2.36</td>
</tr>
</tbody>
</table>

2.65 This is a further demonstration of the fact that the Council’s development strategy must be revised to remove the stepped trajectory and seek to allocate further deliverable sites that can contribute to supply early in the plan period. A sustainable spatial strategy can be achieved in Guildford Borough that will enable a return to a plan led system of decision making, which has been sorely lacking for over a decade.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: pslp171/3515  Respondent: 11458241 / Bewley Homes  Agent: Neame Sutton Limited (David Neame)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1.0 Detailed Representations in Relation to Effingham

1.1 Having provided representations in relation to the Plan as drafted and the accompanying SA (see Part 1 of Bewley Homes’ representations) this section sets out Bewley Homes’ proposal for the allocation of land at Orestan Lane, Effingham as a sustainable location immediately adjacent to the settlement. The proposal is supported, where relevant, by appropriate detailed technical evidence primarily in relation to the following matters:

· Landscape and Visual Impact and Green Belt HIDA
· Highways and Transportation Matters Motion

1.2 As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Effingham as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.

1.3 This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.
1.4 The need for the Council to properly consider the available supply from smaller sites currently within the Green Belt is of vital importance. The level of historic under supply in the Borough is substantial and the current Plan strategy is set up to fail by not even maintaining a 5-year supply of deliverable housing sites across the Plan period. Further the Council’s strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.

1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 In specific relation to Effingham Bewley Homes’ notes that the Council had previously (at the Sites Issues and Options Consultation stage in October 2013) proposed two locations as potential housing allocations and Green Belt boundary releases at Effingham.

1.9 It would appear from a review of the Green Belt assessment prepared by Pegasus on behalf of the Council that the two proposed allocations were simply removed by the Council purely on the basis that they attracted objection rather than as a result of objective assessment.

1.10 Setting this point to one side and as set out in Sections 2 and 3 above the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided to change from a position whereby housing was to be allocated in Effingham to a position that it now proposes no growth to meet the needs of the community at all throughout the plan period.

1.11 The Council’s approach in this regard is without foundation and based on flawed evidence.

1.12 As demonstrated in the attached appraisals (and explored below) land at Orestan Lane represents a viable location for a relatively limited release of land from the Green Belt to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

1.13 Much of the attached appraisal information was provided to the Council in representations submitted in 2013. This information remains relevant to these representations given that the Council has not acted on or responded to the original representations. Updates and additional information is also included to ensure the appraisals respond to the approach the Council is now pursuing in the Plan.

1.14 As identified in Part 1 of Bewley Homes’ representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Effingham, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Effingham in terms of meeting their needs for further open market and affordable housing.

1.15 As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Effingham is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban
Area of Guildford, Ash and Tongham. Effingham is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.

1.16 Turning to consider Bewley Homes promotion site. Land at Orestan Lane, Effingham is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.16.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Effingham and fronts onto Orestan Lane. As set out above Effingham comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is also reflected by its initial proposal for allocation options in 2013 on peripheral greenfield sites as releases from the Green Belt.

1.16.2 The promotion site itself comprises three paddocks that are well contained by mature landscape planting and trees. The site is framed by existing residential development to the north (Leeewood Way) and development to the south of Orestan Lane and further west along the lane.

1.16.3 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.16.4 The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion. With regard to the relative accessibility of the site to services and facilities when compared with the two locations that the Council explored in 2013 it is apparent that, using the same methodology as that employed by the Council, the promotion site scores better in terms of its accessibility and is therefore more sustainability located in terms of the existing services and facilities in the village.

**Contribution to Green Belt and Landscape and Visual Impact:**

1.16.5 Having established that Effingham is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

1.16.6 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Effingham. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

1.16.7 To address this matter Bewley has instructed its landscape architect HDA to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 3.

1.16.8 In summary the review concluded the following:

‘If the site were developed it would infill a gap in the existing settlement which has well defined boundaries. The site would not therefore result in the “unrestricted sprawl” of Effingham. Development of the site would not result in the coalescence of settlements. East Horsley is separated from the site and Effingham by a large belt of woodland which physically and visually separates the two settlements and is key to the functionality of these settlements. Development within the site would have no effect on the separation of Effingham and East Horsley…..’

‘In conclusion, the site would form a discrete and appropriate location for residential development in Effingham. The site could be developed without adverse impacts on the Green Belt designation or Effingham Conservation Area. There are strong landscape features on the site which should be retained and would add character and containment to a new development, integrating the site into the existing settlement edge.’

1.16.9 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.
Heritage Assets – Effingham Conservation Area:

1.16.10 The site is located partly within the Effingham Conservation Area and therefore the impact that any residential development would have on this Heritage Asset needs to be given careful consideration.

1.16.11 This matter has been considered by Bewley Homes’ project team and in particular relation to visual and physical impacts HDA concludes that:

‘In the context of the Effingham Conservation Area the site has no visual relationship with the historic core of the village and does not affect the setting of any local listed buildings. The site comprises a number of fields in pasture used for grazing horses and as such the impact of the site at present could be described as neutral in terms of its contribution to the character of the Conservation Area, rather than either positive or adverse. Building on the site affords opportunities for enhancement of the Conservation Area, particularly if the new housing development were of ‘modestly sized two storey dwellings set in small terraces or pairs…..together with irregularly shaped plots, visible gardens, trees, open green spaces’. Appropriate development within the site could make a positive contribution to local character and distinctiveness.’

Transport and Highway Impacts:

1.16.12 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Orestan Lane in accordance with the requirements set out in Manual for Streets.

1.16.13 The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

1.16.14 The site is therefore sustainably located in relation to existing services and facilities within the settlement of Effingham.

Flooding and Drainage:

1.16.15 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.16.16 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

Other Technical Considerations:

1.16.17 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

The Approach to Allocation – Presumption in Favour of Sustainable Development:

1.16.18 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.16.19 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.
1.16.20 **Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.16.21 **Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

1.16.22 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.16.23 **Environmental** – It has been demonstrated through the detailed review undertaken by HDA that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.17 For all of the above reasons it is considered that Land at Orestan Lane, Effingham comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.18 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Orestan Lane, Effingham comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement and removed from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

1.2 As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of Wood Street Village as a sustainable location and as a consequence the proposal to remove the settlement from the Green Belt.

1.3 This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are required to deliver the housing necessary to meet the OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.

1.4 The need for the Council to properly consider the available supply from smaller sites currently within the Green Belt is of vital importance. The level of historic under supply in the Borough is substantial and the current Plan strategy is set up to fail by not even maintaining a 5-year supply of deliverable housing sites across the Plan period. Further the Council’s strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.

1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes. The Council has missed the opportunity presented by Bewley Homes’ promotion site in this instance given that it comprises previously-developed land partly within the settlement. In accordance with the Council’s spatial strategy the release of land such as this promotion site is a priority for the Council, which has been completely overlooked in this instance.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 As set out in Part 1 of Bewley Homes’ representations the Council has not undertaken a full review of all suitable and available alternatives nor has its consultants explored other options for release from the Green Belt. As a consequence the Council has simply decided not to make any provision for growth to meet the needs of the community at all throughout the plan period within Wood Street Village.

1.9 The Council’s approach in this regard is without foundation and based on flawed evidence.

1.10 As demonstrated in the attached appraisals (and explored below) land at Hester’s Yard represents a viable location for a relatively limited release of land from the Green Belt on a previously-developed site to provide a scale of development that is appropriate and proportionate to the size of the settlement, which the Council itself acknowledge as a sustainable location.

1.11 As identified in Part 1 of Bewley Homes representations the Council’s current development strategy fails to ensure delivery in the early years of the plan period to meet the needs of the Borough’s population in terms of new housing. There is a need for the release of more modest scale housing sites in sustainable locations, such as Wood Street Village, that can deliver housing in the first 5 years of the Plan period in particular. Equally the Council’s current approach fails the residents of Wood Street Village in terms of meeting their needs for further open market and affordable housing.

1.12 As confirmed in the Council’s own Settlement Hierarchy Study (May 2014) Wood Street Village is regarded as a Large Village, which is the third tier in the settlement hierarchy below the Rural Service Centre of East Horsley and the Urban Area of Guildford, Ash and Tongham. Wood Street Village is therefore a suitable and sustainable location for accommodating a modest scale of growth in the manner proposed by Bewley Homes in these representations.
1.13 Turning to consider Bewley Homes promotion site. Land at Hester’s Yard, Wood Street Village is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 40 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.13.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of Wood Street Village and the front section of the site is actually within the settlement and benefits from a direct road frontage onto Oak Hill. As set out above Wood Street Village comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is reflected in its desire to roll back the Green Belt boundaries in the Plan.

1.13.2 The promotion site itself comprises a variety of commercial uses including open storage, vehicle repairs and servicing. The site is predominantly previously developed land in accordance with the definition set out in Annex 2 of the Framework.

1.13.3 Given the emphasis that the Council is placing upon the release of previously developed land to meet its housing requirement this promotion site is considered to comprise just the kind of location that should be allocated in accordance with Paragraph 4.1.6 of the Plan that states:

> *Our preference is to focus growth in the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).*’ (Bold is our emphasis)

1.13.4 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.13.5 The site benefits from direct access to local services and facilities as set out in the attached Transport Accessibility Appraisal prepared by Motion.

**Contribution to Green Belt and Landscape and Visual Impact:**

1.13.6 Having established that Wood Street Village is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

1.13.7 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to Wood Street Village. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.

1.13.8 To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is attached at Annex 2.

1.13.9 In summary the review concluded the following:

> *This review provides a clear indication that the site is entirely suitable for extraction from the Green Belt, without resulting in any adverse effects on the Green Belt function as identified within the NPPF, or on the local landscape character or the amenity of local visual receptors. This results primarily from the clearly demarcated boundary features, existing commercial uses within the site, the enclosed nature of the site and the consequential limitation in landscape and visual effects, but also the way in which the site is severed from the key area providing openness between Wood Street Village and Fairlands.*

> *A development which seeks to address the constraints of the site, would contribute to retaining the openness of the Green Belt by providing much needed housing on a site where Green Belt function would not be comprised, whilst also providing a sustainable and high quality development which links very well to the existing village.*’
1.13.10 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion site is acceptable and should be released for housing.

Transport and Highway Impacts:

1.13.11 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate vehicular access can be achieved to the site from Oak Hill in accordance with the requirements set out in Manual for Streets.

1.13.12 The site is well located in terms of local community facilities that can be accessed via a range of transportation modes in accordance with the requirements of the Framework and the NPPG.

1.13.13 The site is therefore sustainably located in relation to existing services and facilities within the settlement of Wood Street Village.

Flooding and Drainage:

1.13.14 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not identified as being at risk from any known surface water flooding events. In this respect the site is sequentially preferable in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.13.15 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System (“SUDS”) could be employed as part of any development on the land.

Other Technical Considerations:

1.13.16 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a housing allocation.

The Approach to Allocation – Presumption in Favour of Sustainable Development:

1.13.17 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.13.18 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

1.13.19 Economic – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well-established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.13.20 Social – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.
1.13.21 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.13.22 **Environmental** – It has been demonstrated through the detailed review undertaken by EDP that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and, will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.14 For all of the above reasons it is considered that Land at Hester’s Yard, Wood Street Village comprises a sustainable location for the allocation of approximately 40 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.15 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Hester’s Yard, Wood Street Village comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, included within the settlement boundary and removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


---

1.0 Detailed Representations in Relation to West Horsley

1.1 Having provided representations in relation to the Plan as drafted and the accompanying SA (see Part 1 of Bewley Homes’ representations) this section sets out Bewley Homes’ proposal for the allocation of land at Foxbury, West Horsley as a sustainable location immediately adjacent to the settlement. The proposal is supported, where relevant, by appropriate detailed technical evidence primarily in relation to the following matters:

- Landscape and Visual Impact and Green Belt
- Highways and Transportation Matters

1.2 As a starting point it is important to highlight that Bewley is supportive of the Council’s identification of East and West Horsley as a sustainable location for accommodating growth and as a consequence the proposal to remove the settlement from the Green Belt and allocate new housing land.

1.3 This section focuses on Bewley’s objection to the Plan on the basis that further greenfield housing sites are clearly required to deliver the housing necessary to meet the correct OAN and most importantly smaller sites should be allocated to enable delivery in the early years of the plan period together with ensuring flexibility.

1.4 The need for the Council to properly consider the available supply from smaller sites currently within the Green Belt is of vital importance. The level of historic under supply in the Borough is substantial and the current Plan strategy is set up to fail by not even maintaining a 5-year supply of deliverable housing sites across the Plan period. Further the Council’s strategy that is currently reliant on a small number of strategic allocations for delivery has singularly failed to address the clear and present need for housing now. The strategy consciously looks to push delivery back to the end of the Plan period whilst ignoring available, suitable and achievable sites that are situated in acknowledged sustainable locations.
1.5 The Green Belt boundary review undertaken by the Council is woefully inadequate and fails to properly consider all suitable locations, such as the promotion site, that could be delivered in the early years of the Plan period and without material harm to the objectives of the Green Belt as demonstrated by the detailed technical appraisal evidence provided by Bewley Homes.

1.6 The development strategy in the emerging Plan therefore requires fundamental review to enable the Council to address the needs of the Borough’s residents.

1.7 Furthermore and for the reasons Bewley has identified above there are fundamental flaws in the Council’s proposals to allocate 2,000 dwellings at Wisley and 1,800 dwellings at Blackwell Farm. The removal of these two allocations would place greater importance on the identification of other suitable and sustainable locations in the Borough to meet the overall housing need. Notwithstanding this point there is a need for the allocation of further sites to ensure sufficient flexibility in terms of supply of housing throughout the Plan period and to enable the Council to respond positively to changes in demand and delivery without needing to revert to a review of the Local Plan.

1.8 Horsley is a sustainable location for accommodating further growth and the Council has not properly assessed its capacity nor has it considered the detailed technical appraisal information presented by Bewley Homes in its representations to the first Regulation 19 consultation in 2016. This failure on the part of the Council has resulted in the Plan missing the opportunity to allocate further land in a sustainable manner to help meet the needs of the Borough’s residents.

1.11 Turning to consider Bewley Homes promotion site. Land at Foxbury is considered to comprise a suitable location for release from the Green Belt and allocation for approximately 50 dwellings to help deliver the Council’s housing requirement for the following reasons:

**Location and Context:**

1.11.1 The proposed allocation site is situated immediately adjacent to the currently proposed boundary for the settlement of West Horsley and fronts onto the A246 (Epsom Road). West Horsley comprises a sustainable location for growth as identified by the Council in its settlement hierarchy. The Council’s regard for the sustainability of the settlement is also reflected its proposed allocation of some 485 dwellings on other sites including peripheral greenfield locations.

1.11.2 The promotion site itself is framed by Cranmore School and its grounds to the west, Squires Garden Centre to the east, an area of woodland (within Bewley’s control) to the north and the A246 to the south.

1.11.3 In both physical and visual terms the site relates well to the settlement and appears as part of the settlement when viewed on the ground.

1.11.4 The site benefits from direct access to local services and facilities as illustrated on the attached plan (see Transport Accessibility Appraisal prepared by Motion – Annex 3) and in particular the following key facilities:

- Cranmore School
- Newsagent
- Dentist
- Post Office
- Village Hall
- Bus Stops

**Contribution to Green Belt and Landscape and Visual Impact:**

1.11.5 Having established that West Horsley is considered to comprise a sustainable location for growth and that the promotion site is well related to the settlement the next key consideration is the matter of the contribution that the site makes to the Green Belt alongside more general landscape and visual impact issues.

1.11.6 It is relevant to note that the Council’s Green Belt and Countryside Study undertaken by Pegasus in January 2013 did not assess the promotion site when consideration was given to West Horsley. No conclusion has therefore been drawn on behalf of the Council as to the contribution the promotion site may make to the Green Belt.
1.11.7 To address this matter Bewley has instructed its landscape architect EDP to undertake a review of the contribution
the site makes to the Green Belt and also more general landscape and visual impact issues. A copy of the review is
attached at Annex 2.

1.11.8 In summary the review concluded the following:

‘…..the findings of the review undertaken clearly demonstrate that the site could be released from Green Belt without
adversely affecting the wider functions in the context of the area of open land between East and West Horsley. The
consideration goes further to consider the sustainability issues of the site, and whether the boundaries of the site could
provide a long term, defensible, development area, which serves to contribute to Green Belt functions.

In these respects the site is again found to be viable, both with reference to the other Potential Development Areas
(PDAs) around the village (as identified within the Council’s Green Belt review of 2015) and also in its own right. The
site is essentially a parcel of land contained on all sides by existing strong boundary features (mostly of an urban
character), and serves no function in terms of maintaining the open area between East and West Horsley.

In terms of potential landscape and visual effects, the limitation in views available of a proposed development in this
location confirms that development on the site would have little, or no, effects upon either sensitive or non-sensitive
receptors, with any change limited to those receptors passing along the A246, a small number of adjacent residential
dwellings and glimpse views from a nearby bridleway.

In landscape terms the site is not within the AONB or AGLV, and will not be openly visible from either area; indeed it is
likely that there will be no views from the AONB, except perhaps distant views from a small number of residences along
Shere Road, where views would be in the context of the existing settlement. There will be a change from an open pasture
field to one of built development, but even the Council’s own Green Belt study identifies (erroneously) this site as medium
density development, indicating the heavily influenced character of the site.’

1.11.9 It is therefore evident that in terms both of the Green Belt and landscape and visual impact matters the promotion
site is acceptable and should be released for housing.

Transport and Highway Impacts:

1.11.10 In relation to transport and highway impacts the technical appraisal undertaken by Motion confirms that adequate
vehicular access can be achieved to the site from Epsom Road in accordance with the requirements set out in Manual for
Streets.

1.11.11 The site is well located in terms of local community facilities that can be accessed via a range of transportation
modes in accordance with the requirements of the Framework and the NPPG.

1.11.12 The site is therefore sustainably located in relation to existing services and facilities within the settlement of West
Horsley.

Flooding and Drainage:

1.11.13 The whole site is within Flood Zone 1 on the Environment Agency’s indicative flood mapping and is not
identified as being at risk from many known surface water flooding events. In this respect the site is sequentially preferable
in flood risk terms. Furthermore the site is sequentially preferable when compared with a number of other locations such
as Land at Wisley and Normandy/Flexford both of which contain land in Flood Zones 2 and 3.

1.11.14 There are no known land drainage issues on the site and in this respect a Sustainable Urban Drainage System
(“SUDS”) could be employed as part of any development on the land.

Other Technical Considerations:

1.11.15 Other technical considerations such as ecology, archaeology, arboriculture, noise, etc are not considered to pose a
constraint to the development of the site for housing such as to preclude the favourable consideration of the site as a
housing allocation.
The Approach to Allocation – Presumption in Favour of Sustainable Development:

1.11.16 Taking into account Bewley’s representations that consider the need for the allocation of additional sites to ensure the Council can deliver housing in the early years of the plan period combined with the flaws in at least two of its large scale allocations there is a clear and present need for the inclusion of this site for housing in the Local Plan.

1.11.17 The Government emphasis in national Policy is centre on the presumption in favour of sustainable development. Paragraph 7 of the Framework identifies the three strands of sustainable development as comprising the economic, social and environmental strands. If these can be met then there is a clear presumption in favour that should lead to the natural conclusion the land should be allocated for housing.

1.11.18 **Economic** – The delivery of new housing on the promotion site will secure local employment in the short term during the construction phase, which is now a well established and accepted benefit of residential development. Additionally any new residential development will contribute to the local economy in terms of Planning Obligations and via other means such as future Council tax revenues, new homes bonus and indirectly through increased revenue into the local economy. The economic limb is therefore met by the promotion site.

1.11.19 **Social** – As set out earlier within Bewley’s representations there is a clear and present need for new housing in the Borough now to meet the substantial shortfall in supply and to ensure that the OAN can be delivered year on year from the start of the plan period rather than from half way through it. Additionally the Council’s SHMA identifies substantial affordable housing need that cannot ever be met in the life of the new Plan based on the proposed affordable housing policy approach. Finally the Council’s proposed reliance upon strategic development, particularly at Wisley and Blackwell Farm, is likely to lead to failure in terms of delivering the overall housing requirement where the Council is reliant upon every source of supply to deliver in order to meet its OAN.

1.11.20 Therefore any proposals of more modest scale that can deliver a range of open market and affordable dwellings in a timely manner will result in social benefit in terms of helping to meet the clearly identified needs and providing the Council with a buffer of additional housing to help safeguard against non-delivery elsewhere.

1.11.21 **Environmental** – It has been demonstrated through the detailed review undertaken by EDP that the site can be released from the Green Belt without causing any unacceptable harm either in Green Belt or landscape and visual impact terms. Furthermore the site is accessible to local services and facilities, integrates well with the settlement and will not give rise to any undue adverse impacts on the local highway network. The environmental limb is therefore met by the promotion site.

1.12 For all of the above reasons it is considered that Land at Foxbury, West Horsley comprises a sustainable location for the allocation of approximately 50 dwellings that will assist the Council in ensuring its housing delivery obligations are met and that most importantly delivery of the right level of housing takes place early in the plan period.

1.13 Bewley therefore considers that for the Plan to be found sound further land allocations are required and Land at Foxbury comprises a sustainable option that is available for immediate delivery. The site should be allocated for housing, removed from the Green Belt and included within the settlement boundary for West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPP16/10205  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Representations relating to Policy S2 ‘Housing Provision’

Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

Improving affordability, having regard to market signals The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”

NPPF 2012, Paragraph 17

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”

NPPG, Paragraph 19

The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average.

The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial...
thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”
NPPF 2012, Paragraph 181

The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”
NPPF 2012, Paragraph 43

The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and Elmbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies.”

SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011. In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate, to ensure a robust and realistic housing land supply. Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall strategic vision of the Local Plan.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/17151  **Respondent:** 11659905 / Thakeham Homes (Anthony Heslehurst)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Guildford Pre Submission Local Plan – Representations
Re. Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

Thakeham Homes Ltd are submitting representations to the Guildford Pre Submission Local Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire. We are progressing a number of potential development sites within this Borough at varying stages of the planning process, therefore our representations specifically relate to the role of the emerging Local Plan in the delivery of the Borough’s housing need over the plan period.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

We also wish to make representations with regard to the need for a clear and robust supply of housing sites in the first five years of the plan period, including through the identification of additional specific, deliverable sites for residential development. In addition, we also make representations to the proposed affordable housing policies and the need for flexibility to adapt to change. As such, these representations concern Policies S2 and H2 of the Pre Submission Plan and their relationship with the evidence base documents.

Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

These representations are submitted in respect of Thakeham Homes’ interests on land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford (‘the site’). The site is also known by LAA reference 1264, and has been previously promoted to the Local Plan, including to the Draft Local Plan consultation in autumn 2014.

We wish to support the proposed insetting of Shalford within the Green Belt in the Pre Submission Local Plan, however we object to the proposed designation of the site as ‘Open Space’ and the findings contained within the Amenity Assessment, which does not in our view provide sufficient justification for the allocation.

We confirm within these representations that the site is available and deliverable in the short-term, within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the main policies contained within the Pre Submission Local Plan, before addressing how these relate to the site.

Representations relating to Policy S2 ‘Housing Provision’

Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

Supply Deficit

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.
We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

Improving affordability, having regard to market signals

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.” NPPG, Paragraph 19

The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.” NPPF 2012, Paragraph 181

The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development” NPPF 2012, Paragraph 43
The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and Elmbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies.” SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011. In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.

We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17154</th>
<th>Respondent:</th>
<th>11659905 / Thakeham Homes (Anthony Heslehurst)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
</tbody>
</table>
Conclusions

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with national policy and therefore ‘sound’ with respect to the NPPF.

With regard to the expected shortfall of circa 2,000 dwellings by 2017/18, it is our view that at least a further 400 dwellings per annum are required in the first 5 years of the plan period, to enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA. In addition, we consider that the plan should account for market signals and the duty to cooperate to ensure a robust and realistic housing land supply.

Given the issues discussed within this representation, it is our view that the council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint. This would allow the Council to bring forward housing more quickly in the early years of the plan period in a way that fits the overall strategic vision of the Local Plan. As stated above, we recommend the land to the rear of Greenhill and Burnside, Shalford, is removed from policy I4 as open space due to its minimal amenity value. We have also demonstrated within these representations that we consider the site to be achievable, suitable and achievable for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- [2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 1.pdf](https://example.com/file1.pdf) (382 KB)
- [2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane Appendix 2.pdf](https://example.com/file2.pdf) (1.2 MB)
- [2016 07 18 GBC Pre Submission LP Representations Chinthurst Lane.pdf](https://example.com/file3.pdf) (469 KB)

Comment ID: PSLPP16/18668  Respondent: 11659905 / Thakeham Homes (Anthony Heslehurst)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Pre Submission Local Plan – Representations Re. Ash, Land North of Grange Road

Thakeham Homes Ltd are submitting representations to the Guildford Pre Submission Local Plan as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire. We are progressing a number of potential development sites within this Borough at varying stages of the planning process, therefore our representations specifically relate to the role of the emerging Local Plan in the delivery of the Borough’s housing need over the plan period.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

We also wish to make representations with regard to the need for a clear and robust supply of housing sites in the first five years of the plan period, including through the identification of additional specific, deliverable sites for residential development. In addition, we also make representations to the proposed affordable housing policies and the need for flexibility to adapt to change. As such, these representations concern Policies S2 and H2 of the Pre Submission Plan and their relationship with the evidence base documents.
**Land to the North of Grange Road, Ash**

These representations are submitted in respect of Thakeham Homes’ interests north of Grange Road, Ash (‘the site’). The site is also known by LAA reference 2247, and is included within the proposed strategic allocation ‘A29 Land south and east of Ash and Tongham’. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that the site is available and deliverable within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the policies contained within the Pre Submission Local Plan, and support the proposed allocation of the site for residential development.

**Representations relating to Policy S2 ‘Housing Provision’**

Since the publication of the NPPF in 2012, the central thrust of the Government’s planning strategy has been to ‘significantly boost’ the supply of housing, including a requirement for Local Planning Authorities (LPA) to meet the full, objectively assessed needs (OAN) for housing within their areas. Policy S2 sets out how the Council intends to meet the housing needs of the Borough over the plan period, therefore these representations relate to the adequacy of this policy in meeting these needs, with particular regard to the issues of the deficit in supply, the need to account for market signals, and the duty to cooperate. We suggest that potential solutions to housing supply could include the identification of additional housing site allocations and an increased windfall allowance to allow flexibility to adapt to changing needs.

**Supply Deficit**

As stated above, it is important that the plan genuinely addresses the full OAN for the Borough if the Council are to demonstrate a 5-year housing land supply in the early years of the emerging plan period. Significantly, the NPPF requires that where there has been a persistent under delivery of housing, a buffer of 20% should be applied to provide a realistic prospect of achieving the planned supply.

We note that housing supply within Guildford Borough has been somewhat low in recent years. The Council’s Land Availability Assessment (LAA) published February 2016 notes that as of the monitoring year 2015/16, there is an existing shortfall of at least 1,351 units, which is expected to increase to 2,019 units by monitoring year 2017/18. Based on the Council’s housing delivery expectations, the emerging Local Plan will not address this shortfall until the year 2026/27.

On the basis of the housing supply identified within the Pre Submission Local Plan, we do not consider that the Council would be able to sustain a 5 year housing land supply into the plan period, therefore it is our view that further sites should be identified to enable the Council to deliver more housing within the first 5 years. This will enable the Council to meet its OAN prior to larger strategic sites coming forward in accordance with the housing trajectory in the LAA.

**Improving affordability, having regard to market signals**

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of these is the need to take into account market signals, such as land prices and housing affordability:

“[Local Plans] should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area”

NPPF 2012, Paragraph 17

Expanding on this, the NPPG emphasises the importance of providing for relevant market signals in providing the full, objectively assessed housing needs of the area:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”

NPPG, Paragraph 19
The Council acknowledges the increasing gap between earnings and average house prices, which is higher than the average for Surrey and significantly higher than the national average. The House Price Index (HPI) uses the Land Registry’s dataset of completed sales, and is reported on a monthly basis. In the most recent monthly report on 14th June 2016, the HPI revealed an 8.7% annual increase in house prices in Guildford to £418,806, compared with the national average house price of £224,731. Furthermore, the Index of Private Housing Rental Prices (IPHRP), which is produced by the Office for National Statistics on a quarterly basis, shows a 3.4% annual increase in private rents across the South East, compared to 2.6% in England and Wales as at May 2016.

It is our view that the extraordinary price and rent increases in the Borough are a market signal that additional housing is required in order to meet demand. This is at least a partial consequence of previous under delivery in the first 3 years of the plan period, and will likely worsen throughout the plan unless there is a significant boost to the supply of housing. With this in mind, we would recommend a number of additional housing site allocations to account for market signals in accordance with the NPPF and to enable the Council to demonstrate an ongoing five-year housing land supply.

Duty to Cooperate

The NPPF duty to cooperate requires that LPAs demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”

NPPF 2012, Paragraph 181

The West Surrey Strategic Housing Market Assessment (SHMA) September 2015 identifies important cross boundary interactions not only within the HMA, but also with neighbouring authorities:

“Although weaker than the core relationships, there are identifiable and important functional interactions with adjoining authorities of East Hampshire, Rushmoor, Surrey Heath, Runnymede and Elmbridge. In the context of the Duty to Cooperate, these authorities in particular should be engaged in strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies.”

SHMA 2015, Paragraph 10.5

There is an unmet need for housing in Guildford’s neighbouring authorities, including Surrey Heath Borough, which has a claimed housing land supply of just 3.67 years, including a backlog of at least 721 dwellings since monitoring year 2011.

In addition, London is expected to have an unmet need of up to 200,000 dwellings over its current plan period (2015-2025). Research carried out by Nathaniel Lichfield and Partners for the consultation on the Further Alterations to the London Plan, indicated that Guildford could be expected to provide up to 2,177 dwellings over this period. At present, there is no indication of making any provision for this wider need within the Pre Submission Local Plan.

It is our view that opportunities still exist throughout Guildford Borough to deliver some or more housing in the most sustainable settlements in line with the objectives of national planning policy and in the spirit of the duty to cooperate. As such, it is our view that additional housing allocations are required to assist in meeting some of the identified need within neighbouring authorities, whilst also supporting the vitality of the communities within the towns and villages across the borough.
We consider that given the above uncertainties and the need for housing delivery in the first five years, a higher windfall allowance is required to enable flexibility in supply and facilitate suitable sites coming forward in the early years of the plan period.

Allocated Housing Sites

The Pre Submission Local Plan provides for the delivery of 13,860 dwellings in the plan period 2013-2033, including a number of smaller site allocations to deliver housing in the period 2019/20 to 2022/23. If delivery is provided in line with the plan, then the LAA housing trajectory estimates that there will be a cumulative deficit of around 900 dwellings after the first five years of the plan period.

There is therefore an additional need for housing within the first 5 years of the plan period. This can be best delivered by identifying a number of further housing site scale allocations in sustainable locations across the Borough and in the areas of lowest constraint to enable the Council to meet both its own housing need as well as assisting with meeting that of neighbouring authorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
growth rates achieved in comparable areas) and could be expected to improve affordability. It would also help to increase the supply of affordable housing. Once the need for student accommodation is factored in, the full OAN would amount to c.725-775 dpa.

For the above reasons, we consider that draft policy S2 is unsound because the OAN figure used (and subsequent housing requirement in the PSLP, which seeks to meet the OAN) is not in fact the full OAN- is too low. In order to make the plan sound, an increase in the OAN/housing requirement is needed (to c.725-775 dwellings per annum) to ensure that OAN and plan housing requirement reflect the PPG and para 14 of the NPPF.

Furthermore, with respect to Policy S2, we have also reviewed the Land Availability Assessment (LAA) Addendum which has been published alongside the PSLP. The LAA Addendum contains the Council's current position on its five-year housing land supply and concludes it can only demonstrate 2.36 years supply. The shortfall is to be addressed through the allocation of additional green belt sites through the adoption of the Local Plan. The LAA Addendum Housing Trajectory identifies that 1,395 units are anticipated from Green Belt sites within the first five years of the plan period, representing 39% of the potential housing provision identified for this time period. Therefore, at present there is an over-reliance on currently unallocated green belt sites within the first five years of the plan. This could be partly addressed by the earlier delivery of urban sites which are currently allocated to later phases of the plan.

In the context of the revised OAN/housing need requirements identified, we calculate that the Council's five year supply is actually in the region of 1.94 to 2.09 years.

In addition the 'deliverability' of a number of the sites identified which do not have planning permission is queried in the context of the NPPF requirement for sites to be "achievable with a reasonable prospect of housing being delivered within five years" (Footnote 11). This is especially relevant within Guildford Borough Council, where there is a very poor track record of approving major residential development schemes[1].

Excluding sites without planning permission the five-year housing land supply is argued to be a low as 1.47 years (based on our OAN of 775).

On the above basis, we consider that there is a 'serious and significant' shortfall in the Council's five year housing land supply. This should be explicitly addressed in Policy S2, which currently does not refer to expected housing supply with the first five years of the plan period. Accordingly, and alongside our concerns regarding the OAN/housing requirements, we consider that Policy S2 is unsound.

[1] Department of Communities and Local Government figures show that 47% of major residential applications were approved by GBC, compared to the average in England of 81%, in the year ending March 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Let me first comment that the Borough asserts that it is listening to local views. It is clear that this is not the case. It may be hearing the residents views but it is obviously not listening to them, as it appears to have refused all requests for the calculations and assumptions that underpin, for example, the 'Housing Need Figure' to be made public. I am saddened by the apparent lack of transparency and openness in this respect and, reluctantly, I draw the conclusion that the Borough has something to hide.

A respected and independent analysis of the 'Housing Need figure' clearly shows that the Borough has chosen to overestimate that aspect of the plan and a per annum reduction reduction of around 250 new builds would be adequate to meet need. That equates to 7676 homes and not 13,893 over the period. This figure meets the clearly and carefully researched analysis undertaken by a respected national expert and is a reduction of over 6000 - a medium size village - over the period of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Disproportionate level of development focussing on one areas of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Disproportionate level of development focussing on one areas of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16661</th>
<th>Respondent: 12050145 / richard gunston</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Sewage system will need upgrading</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The traffic is already a nightmare – the proposals you have set out do not in any way satisfy the enormous increase in traffic your plan would attract. Burpham is already gridlocked and cannot possible handle and increase in traffic volume –</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The highways agency need to sort out the A3 before any of these developments proceed. A tunnel would be the most preferable option.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1232</th>
<th>Respondent: 12062017 / Dandara Ltd (John Richards)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>These representations supplement, and should be read alongside those prepared by Dandara Ltd for the 2016 Proposed Submission Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>They demonstrate significant deficiencies associated with the 2017 SHMA addendum which fails to identify full, objectively assessed need for market and affordable housing as required by the NPPF resulting in the Local Plan being unsound. Such deficiencies primarily focus upon excluding two years of housing need, being 2013-15 previously included within the 2015 SHMA, alongside over reliance upon 2016 post-Brexit economic forecasts which significantly divert from those used in the 2015 iteration with little interrogation or sensitivity testing of the inputs which is imperative given the uncertainties surrounding the Brexit process. The addendum also fails to apply an adequate housing uplift to positively address chronic affordability levels and rates of household formation suppression evident in Guildford alongside a rising student population.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The 2017 Proposed Submission Local Plan remains fundamentally unsound due to an over reliance on large-scale, strategic housing allocations which are unable to deliver housing until later in the Plan period due to associated infrastructure challenges. This has resulted in the Council being unable to reinstate a five year housing land supply following adoption of the Plan, exacerbating short term housing delivery pressures and increasing unaffordability. Furthermore, it has forced the Council to propose a staggered housing target within Policy S2 of the Local Plan which reduces housing delivery below OAN during the early years of the Plan putting additional pressure on immediate housing...</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
supply, affordability and household formation. This is entirely unnecessary and avoidable given the availability of a range of small and medium scale sites including Potential Development Areas (PDAs).

The 2017 Proposed Submission Local Plan recognises the desperate need to identify additional short to medium scale housing sites which can deliver new homes during the early part of the Plan period. This includes a commitment to reassessing all PDAs which were previously identified within the Green Belt and Countryside Study (GBCS) as not fundamentally contributing to the five NPPF Green Belt purposes. Despite the 2017 SA update acknowledging that there are sustainable options to deliver housing significantly above OAN, no serious assessment has been undertaken for PDAs and no additional PDAs have been allocated to boost housing delivery to meet objectively assessed need.

Taking land west of Shere Road in West Horsley as an example, the SA automatically rules out the PDA as a ‘given’ on the basis it was rejected by the 2016 Land Availability Assessment (LAA). However, the reason for exclusion in the LAA was that it was not considered to accord with the preferred spatial strategy, a spatial strategy which the SA update was tasked with reconsidering given a lack of short to medium term housing supply. It was also considered that the site fell within ‘high sensitivity’ Green Belt, albeit identification as a PDA clearly demonstrates the land as making no meaningful contribution to wider, strategic Green Belt purposes.

Finally, the Council attempt to suggest that the Horsleys cannot sustainably accommodate any additional housing numbers above those proposed for allocation in the 2017 Proposed Submission Local Plan. This is completely unevidenced especially given that the 2016 iteration proposed an additional 138 homes for the Horsleys which have since been removed. If the Council consider that the Horsleys can only sustainably accommodate a finite number of new homes, especially given chronic short term need, this must be fully evidenced alongside consideration of whether any adverse impacts can be mitigated alongside future development.

The Proposed Submission Local Plan is fundamentally unsound by failing the ‘positively prepared’ test which requires objectively assessed development needs to be met, including need arising from neighbouring authorities. Neither can the Plan be considered ‘justified’ as the most appropriate strategy when considered against reasonable alternatives given the availability of small and medium scale PDAs which can assist the Council with meeting a chronic need for short to medium term deliverable housing. The Council must include additional short to medium term housing sites to be found sound, with PDAs shown not to contribute to the five main Green Belt purposes representing an available, deliverable and evidenced source of additional supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1237  Respondent: 12062017 / Dandara Ltd (John Richards)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

2.0 Establishing Full, Objectively Assessed Housing Need

2.1 Para. 47 of the National Planning Policy Framework (NPPF) requires Local Authorities to boost significantly their supply of housing by using their evidence base to ensure that Local Plans meet full, objectively assessed needs for market and affordable housing in a housing market area.

2.2 The housing target within the 2017 Proposed Submission Local Plan has reduced from 13,860 over the period 2013-33 to 12,426 over the period 2015-34. This represents a - 1,434 reduction in housing numbers compared with the 2016 iteration. Para. 2.9 of the 2017 Housing Delivery Topic Paper explains that “this factual update has resulted in a reduced objectively assessed need for Guildford from 693 homes per year (2013-33) to 654 homes per year (2015-2034). Over the Plan period, this has resulted in a reduction of approximately 1,400 homes”.

2.3 The Council consider that the revised housing target of 12,426 over the period 2015-34 accords with para. 47 of the NPPF as representing full, objectively assessed housing need (OAN) as established by the 2017 addendum report to the original 2015 West Surrey Strategic Housing Market Assessment (SHMA). We consider that there are numerous deficiencies and inconsistencies contained within the 2017 SHMA which demand a reassessment of the OAN baseline.

SHMA Plan Period

2.4 The original 2015 SHMA considered housing delivery over the twenty year period 2013-33. The 2017 SHMA addendum explains at para. 1.2 that the Plan period has been rolled forward to 2034, “... to ensure that it covers a 15 year period from the point of adoption”. We have no objection to the Plan period being increased by one year to 2034. However, in parallel, and without justification, the start date of the Plan period has been brought forward by two years from 2013 (2015 SHMA) to 2015 (2017 SHMA).

2.5 No justification has been provided within the SHMA to explain why the Plan period, and thus the SHMA assessment period, has been brought forward to commence at 2015, covering a total of nineteen rather than twenty years. We consider that this approach is unsound for the following reasons:

(i) The 2017 SHMA addendum has effectively discounted two years of housing data that was previously assessed within the original 2015 SHMA as experiencing housing need of 693 dpa. The 2015 SHMA acknowledged that the OAN for the two year period 2013-15 was 1,386 homes (693 x 2) which was incorporated into the housing trajectory and five year housing land supply calculations for the original 2016 Proposed Submission Local Plan. The 2017 SHMA addendum has removed these two monitoring years with the only justification seemingly based on the unrelated requirement to extend the Plan period by a single year to 2034 (n.b. achieving 15 years post adoption). The effect of this is that two years of housing need experienced over the period 2013-15 have been removed from the emerging Local Plan, with any shortfall experienced effectively remaining unmet in perpetuity due to the Plan period now commencing from 2015;

(ii) Para. 3.3 of the 2017 SHMA addendum states that “the starting point is the base date for which up-to-date data is available on the Borough’s population and employment base”. However, this explanation does not justify why the SHMA base date of 2013 should be moved to 2015 with the loss of two years housing need data previously included in the 2015 SHMA. Planning Practice Guidance (PPG) is clear that “the 2012-2037 Household Projections were published on 27 February 2015, and are the most up-to-date estimate of future household growth” (para. 016, ref ID: 2a-016-20150227). The most up-to-date population and household projections published by DCLG which provide the starting point when assessing housing need therefore clearly covers the period 2013-15;

(iii) The 2017 Duty to Cooperate Topic Paper explains how Guildford Borough has worked with neighbouring HMA Authorities to prepare a joint SHMA. There is however no confirmation within the 2017 SHMA addendum that Waverley and Woking Councils have agreed to amend the SHMA assessment period from 2013-33 to 2015-34 which will fundamentally impact on the preparation of their requisite Local Plans. Guildford Borough should not unilaterally amend the SHMA assessment period without proper justification and agreement with partner Councils within the HMA. Para. 4.53 of the 2017 Duty to Cooperate Topic Paper recognises “whilst not fully consistent with the NPPF in relation to covering the entire housing market area, it [the 2017 SHMA addendum] nevertheless reassessed the HMA from a Guildford position ...”.

2.6 The 2017 SHMA addendum contains no justification to explain why the housing need assessment period has been brought forward by two years to exclude the period 2013-15. Such a change would clearly benefit the Council by reducing the quantum of unmet housing need that has accumulated during the early part of the Plan period. This is a fundamentally unsound approach that exacerbates unmet housing need across the Borough, encouraging further worsening of affordability and suppression of household formation.

Demographic Projections

2.7 The 2017 SHMA addendum updates the 2012 ONS sub-national population projections (SNPP) and 2012 CLG household projections. As recognised by the PPG, “household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need” (para: 015, ref ID: 2a-015-20140306).
2.8 Starting with the ONS published SNPP, Table 3 of the 2017 SHMA demonstrates that population growth is projected to rise to a greater degree applying the 2014-based SNPP compared with the 2012-based SNPP. The up-to-date 2014-based SNPP suggests the population in Guildford will grow from 145,473 persons in 2015 to 167,126 persons in 2034, a rise of 21,652. This represents a population increase of +2,271 when applying the 2017 SHMA addendum 2014-based SNPP compared with the earlier 2015 SHMA 2012-based SNPP.

2.9 Likewise, the SHMA addendum demonstrates that household numbers are also expected to rise to a greater degree applying the 2014 CLG household projections compared with the 2012 iteration. The up-to-date 2014 CLG projections suggest the number of households in Guildford Borough will grow from 56,843 in 2015 to 67,196 in 2034, a rise of 10,353. This represents an overall increase in household numbers of +781 when applying the 2014 CLG household projections compared with the earlier 2012 version.

2.10 The 2017 SHMA addendum demonstrates that the 2014 based SNPP and household projections show a clear increase in population and household growth compared with the 2012 iteration which was the basis of the original 2015 SHMA. Following close interrogation of these changes, the 2017 SHMA addendum advises at para. 3.27 that “… we conclude that the 2014-based SNPP for Guildford Borough are technically sound”.

2.11 Whilst the 2014 based SNPP projects higher population growth than the earlier 2012 based iteration, interrogation of the ONS published 2015 mid-year population estimates (MYEs) suggests that the SNPP may be under-estimating growth. Whereas the 2014-based SNPP projected that the population of Guildford would grow by 2,515 persons over the period 2014-15, which itself was higher than the 2012 based SNPP, the MYEs suggest even higher growth at 3,122 representing a difference of +607 persons.

2.12 A consistent pattern therefore emerges of increasing population and household projection growth moving from the 2012-based SNPP and household projections to the 2014-based iterations and then sense checking against the 2015 MYEs.

2.13 It is recognised that the PPG allows for sensitivity testing of the demographic baseline with “… any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence” (para: 017, ref ID: 2a-017-20140306). The 2017 SHMA addendum has therefore considered four alternative population growth projections as set out in Table 7 being:

(i) 2014 based SNPP;
(ii) 2014 based SNPP plus 2015 MYE;
(iii) 10 year migration period feeding into 2014 based SNPP;
(iv) 10 year migration period feeding into 2014 based SNPP plus UPC.

2.14 Looking at projected population growth, there is a very close correlation between scenarios (i), (ii) and (iii) with a difference of less than 750 persons over the period 2015 to 2034 (39 per year).

2.15 There is a similar pattern when the four SNPP based scenarios are converted into household need with scenarios (i) to (iii) all being very similar, projecting a change in household numbers over the period 2015-34 of between 10,350 and 10,849.

2.16 There is a clear discrepancy within the 2017 SHMA regarding the application of scenario (iv) which applies unattributed population change (UPC). Table 7, population growth, shows scenario (iv) as a clear outlier, being a significant 6,437 persons less than the closest next scenario whereas the difference between scenarios (i) to (iii) is less than 750 persons. A similar level of discrepancy is also evident within Table 9 which considers household growth. The 2017 SHMA addendum agrees that this scenario is unrepresentative, with para. 3.53 advising that “adjusting projections fully for UPC has been criticised by Planning Inspectors, is an approach which has been rejected by ONS and there is a lack of clear evidence that it can be fully attributed to an over-estimation of migration and to migration estimates over the period post 2005”. Para. 3.39 is more explicit:
“... this scenario needs to be treated with a degree of caution, it is based on population trends from 2005 onwards and is modelling what is potentially an extreme position where UPC is attributed in full to migration”.

2.17 The 2017 SHMA addendum concludes that “the 2014 SNPP adjusted for the latest MYEs would however represent an equivalent projection to that from which the demographic conclusions in the 2015 West Surrey SHMA were derived” (para. 3.54) with the recommendation that “at the present time, GL Hearn consider that using the latest official projections (including with adjustments such as 10-year migration trends) will provide the best estimates of future needs” (para. 3.77).

2.18 Whilst the conclusion to the 2017 SHMA addendum recognises that applying demographic scenarios (i) to (iv) would give a housing need range of between 521-584 dpa, averaging 552 dpa, it advises that the demographic evidence does not justify deviating from the official 2014-based SNPP and CLG household projections due to there being “… no basis for adjusting recent demographic projections for UPC” (para. 8.6).

2.19 It is therefore evident that scenario (iv) should be excluded not only due to concerns regarding UPC raised within the report but also because the close correlation of scenarios (i) to (iii). We consider that scenario (ii) should form the basis of the demographic baseline for the Guildford Borough Local Plan given the robustness of the 2014-based SNPP coupled with ‘sense checking’ against actual MYEs. This would give an annual housing need of 577 dpa.

Employment Growth

2.20 The 2017 SHMA addendum has considered updated econometric forecasts published in late 2016 by Oxford Economics, Cambridge Econometrics and Experian. Despite applying the same methodology to calculate change in workplace employment – para. 5.9 of 2015 SHMA and para. 4.6 of 2017 SHMA addendum – there are significant differences in workplace employment between the two SHMA iterations which is the largest single contributor to the reduced housing target at Policy S2 of the 2017 Proposed Submission Local Plan.

2.21 Para. 4.7 of the 2017 SHMA addendum explains that “… AECOM calculate that workplace employment in Guildford between 2015 and 2034 is anticipated to grow by 12,893. This represents a reduction of 4,845 net additional jobs from the previous version of this calculation (17,738) issued in August 2015 …”. Whilst it is recognised that the Plan period has reduced from 20 years to 19 years, this still represents a dramatic reduction from 887 jobs per annum within the 2015 SHMA to 679 jobs per annum in the 2017 SHMA addendum. This represents a reduction in annual workplace job growth of 23%.

2.22 Despite this significant discrepancy between the 2015 and 2017 SHMA, there is little assessment of the cause of the reduction within the SHMA addendum itself and certainly no sensitivity testing looking at past workplace job growth trends. A summary of the principal changes contained within the 2017 SHMA addendum are explained within para. 4.40 of the 2017 Duty to Cooperate Topic Paper which states “the addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 mid-year population estimate”.

2.23 The PPG advises that “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate …” (para 018, ref ID: 2a-018-20140306). Whilst we do not doubt that ‘Brexit’ will impact upon economic development and job creation, currently there is little certainty regarding the form that Brexit will take from an economic perspective including future trade arrangements with the EU and the rest of the world. In particular:

- Any economic forecasts published in late 2016 will have likely been influenced by the premise of a ‘hard Brexit’ which, following the general election and the failure of the Conservatives to secure a parliamentary majority, may be significantly paired back to ensure a majority is achieved on key votes in parliament;

- It is likely that any firm agreement on economic and trade terms will not be known for some time as negotiations prioritise the status of EU / UK nationals, costs associated with leaving the EU and the Northern Ireland and RoI border;

- There remains little clarity on how the post-Brexit trading relationship with the EU will be structured. A wide range of scenarios remain available from a complete break reverting to WTO rules to maintaining tariff and customs free access;
- There also remains little clarity on potential trade deals with non-EU countries and the impact or rebalancing this could have on economic growth and job creation in the UK.

2.24 We are not suggesting that Brexit should not be considered within economic and job creation forecasts but the 2017 SHMA addendum has solely based workplace employment growth over the period 2015-34 on late 2016 post-Brexit projections. This is particularly concerning not only due to inherent uncertainties regarding the terms of Brexit but also having regard to the significant reduction in projected jobs growth compared with the 2015 SHMA. We consider there to be five urgent workstreams required:

(i) The 2017 SHMA addendum must include significant interrogation of the three post-Brexit economic forecasts used to understand the assumptions they are making regarding Brexit. It is only through interrogation that it would be possible to understand the terms of Brexit that the three forecasts are anticipating and to then consider these terms moving forward as detailed Brexit negotiations proceed;

(ii) In parallel, the differences between the economic forecasts contained in the 2015 SHMA and the 2017 SHMA addendum should be made clear to allow an assessment of the projected main impacts of Brexit on the Guildford economy. Clearly the economic impact of Brexit, assuming this was known, will differ depending upon the make-up of the economy and the extent of trade, labour and import/export links with the EU. As an example, para. 3.73 of the 2017 SHMA update notes that “Guildford sees a lower proportion of EU in-migrants than was the case at a regional/national level. This would suggest that the migration impact of Brexit might be less in the Borough than other locations …”;

(ii) As with demographic projections, it is imperative that employment and job creation forecasts are sensitivity tested. As an example, it is unclear how the post-Brexit job growth forecast of 679 per annum compares against job growth figures over past recessionary and non-recessionary periods;

(iv) It is important that there is no double-counting regarding the potential impact of Brexit between demographic projections and economic forecasts. For example, para. 3.23 of the 2017 SHMA addendum notes that the 2014-based SNPP projects net international migration to the UK falling from 329,000 in 2014/15 to 185,000 by 2020/12 which is likely to take into account changing EU migration levels associated with Brexit;

(v) It is imperative that the post-Brexit reduction in jobs is considered alongside the objectives of the M3 LEP as well as economic policies contained within the 2017 Proposed Submission Local Plan.

2.25 We strongly consider that the approach of the 2017 SHMA addendum to projecting future workplace jobs growth is unsound being based upon narrow post-Brexit forecasts with no critical assessment or sensitivity testing considering both the inherent uncertainties of the terms of Brexit and the large discrepancy between the 2015 SHMA and 2017 update. Box 6.7 of the SA recognises the impact that this has had on the overall Local Plan housing target “the addendum finds a need for a very small uplift of just 2 dpa, which is a considerable deviation from the SHMA 2015 (120 dpa). This is primarily because updated employment forecasts (from Nov/Dec 2016) are lower …”.

2.26 When looking at potential uplifts to the demographic baseline to support economic growth and job creation, para. 4.26 of the 2017 SHMA addendum explains that “the 2014-based SNPP scenarios would support between 12,700–12,800 jobs …”. Whilst this closely aligns with the post-Brexit 2016 economic forecasts used within the 2017 SHMA addendum, it is evident that it is significantly below the 17,738 jobs projected within the 2015 SHMA.

2.27 There is a real risk that even if one takes a mid-point between the post-Brexit 2016 projections and the original 2015 SHMA projections, there would be a significant shortfall in housing delivery to support projected jobs growth. This would result in economic growth being stifled by lack of housing supply resulting in exacerbated levels of in-commuting, housing price rises (including rental) and decreasing levels of affordability. We therefore consider that an uplift significantly larger than the paltry 2 dpa proposed above the demographic 2014-based SNPP plus MYE of 577 dpa is required to support economic growth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/18641  Respondent: 12136289 / Martin Digby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/697  Respondent: 12191873 / Rob Woof  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The GBC survey totals 10395. This annual number is higher that the number which originally raised concern during the 2014 consultation and so it seems that the figure has been raised despite objections and revised evidence. The sites in or adjacent to Send will delivery almost half of this number. The Garlicks Arch proposal was added very late, without any local engagement and without any time for consultation to take place at any level in the drafting of the plan, which I think is unacceptable and undemocratic, denying meaningful consultations with residents in a timely fashion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17501  Respondent: 13579713 / Roger Daniels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Local Plan Policies S2 and P2, in particular, are not sound.

The proposed phasing of housing supply in Policy S2 (Borough Wide Strategy) is not justified and does not seek to meet the objectively assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are other doubts about whether housing targets will be met because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the Spatial Development Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Housing Needs And The Spatial Development Strategy

Policy S2 of the Local Plan and the Land Availability Assessment of February 2016 (LAA) show that the overall projected supply of housing land (15,116) exceeds the forecast requirement (13,860) over the whole plan period, but that the Council has phased the housing requirement in a curiously uneven way, to reflect constraints on delivery of the required housing supply in the early years of the plan, rather than housing needs.

Even with this unwarranted adjustment to the phasing of housing requirements, the housing supply trajectory (below) shows forecast land supply (the blue line) to be below the forecast requirement (the red line) from 2013/14 to 2018/19 and that the cumulative deficit (the green line) will not be made up until 2027/28; 15 years into the 20-year plan period:

The housing supply trajectory in the LAA also shows that there will not be a five-year housing land supply when the Local Plan is adopted unless there are changes in policy to improve the delivery of housing sites in the early years of the plan. Five-year housing land supply is described in more detail in Section 4.

Changes in the Spatial Development Strategy of Local Plan Policy S2 will be required to increase housing land supply in the early years of the plan to achieve the aims in paragraph 14 of the NPPF:

‘…local planning authorities should positively seek opportunities to meet the development needs of their area’

and the aim in paragraph 47 of the NPPF:

‘to boost significantly the supply of housing…’

Required changes in the Spatial Development Strategy of Local Plan Policy S2 include the allocation of more small and medium-sized sites in sustainable locations that are associated with the main urban areas and larger villages, where development can progress in the early years of the Local Plan, utilising existing infrastructure such as local schools and other services. Changes in the Spatial Development Strategy will need to be associated with a more detailed and realistic approach to the review of Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed phasing of housing supply in Policy S2 (Borough Wide Strategy) is not justified and does not seek to meet the objectively assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are other doubts about whether housing targets will be met because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the Spatial Development Strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7660  Respondent: 14143265 / Robert MacAndrew  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed number of new houses in the Borough is unrealistically high, and will have a seriously detrimental effect on the Green Belt surrounding Guildford. If such land is built on, it will be lost forever. In particular, the Gosden Hill Farm site should not be removed from the Green Belt. All development should be restricted to brownfield sites.

Because of Guildford’s situation as a gap town, there isn’t room for a significant increase in retail and office development. There are already a sufficient number of shops and offices. All that is needed is a swift redevelopment of the site between North Street, the Friary and Woodbridge Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2431  Respondent: 14177313 / Ian Macpherson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The figures for housing in the table come, I believe, from a study by the Council’s Consultant. I have been told that the methodology behind this study is commercially confidential [which is, perhaps, worrying?]. I have now seen the study for EGA by Neil McDonald, which shows, with reasoned argument, a substantially lower set of figures. I regard the McDonald study as the more credible of the two and Obj. in the first instance if it is not taken as the basis of the Local Plan table

However I understand that the Government is preparing a standardised method of calculating housing demand, will publish shortly, and intends to make it more-or-less compulsory on publication. It seems unlikely that this will remain unchallenged [ more particularly since recent figures on immigration, etc, show potentially substantial trend changes].

Any Local Plan publication of Housing Targets should therefore be heavily qualified [ eg noted as subject to amendment as more information comes available].
In practical terms, the phasing of the first five years in the Council table seems not radically different from the McDonald study, so the arguments on phasing of site availability are mutual. It is later where there are significant differences.

In passing I do caution about the presentation of final digits in matters such as population predictions. The 4.1.9a sum figure is 12,426 homes. “6” exactly ??? Figures like this really ought to be presented with standard statistical error statements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2473  Respondent: 14181313 / Vision for Guildford Ltd - GVG (William Stokoe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Guildford Vision Group, a group of concerned residents with very relevant commercial and professional experience, was established four years ago to press for reinvigoration of the town centre. Specifically we have called for six objectives:

1. Wider pedestrianisation of the town centre
2. Exciting new public space along a reinvigorated riverside
3. Redirection of vehicle traffic away from the centre
4. An integrated transport hub and interchange around the rail station
5. New town centre housing
6. A new and better East-West link

These are not unusual or unique objectives. They are the aim of a multitude of UK towns and cities, where many have taken positive action to bring them about. Many would envy Guildford its magnificent setting and the river running through the centre of town, yet Guildford has failed significantly over the past decades to take full advantage of its potential, especially its river. Riverside areas are taken up by surface car parks, buildings with their back to the water and suffer a legacy of piecemeal, unattractive light industrial development. Walnut Tree Close and Woodbridge Meadows, in particular, should be given over to well-planned housing and the scattered light industrial provision should be relocated to an expanded Slyfield where infrastructure and communications would be better.

We are thus disappointed by the lack of real ambition and aspiration in the Local Plan in respect of the town centre. There are no substantial coordinated policies or strategies in the Local Plan that will achieve the six objectives above. These objectives have received wide public support, as recognised by:

- Our 2013 document ‘Guildford on the Way’, a Vision for Guildford in 2030 (attached) as articulated by members of the public, Guildford residents and our members
- Comments and feedback from our public meetings over the past four years that have regularly attracted audiences of 200 and above
- Feedback from our frequent Newsletters to our supporters, interested parties and councillors

The council, in response to our lobbying, commissioned a masterplan for the centre. The masterplan was drawn up by Allies & Morrison, nationally-renowned masterplanners. The masterplan was approved by the council in March 2016 but is yet to be adopted. There is little recognition or acknowledgement of the masterplan in either the Local Plan policies, underpinning information or implementation strategies. We understand that the council propose an Area Action Plan (AAP) for the town centre once the Local Plan is adopted. We are concerned that the AAP will be subject to challenge if
its aims are not foreshadowed in the Local Plan. We believe omission of any mention of the AAP could render the Local Plan unsound in this respect.

We made a lengthy response to the Reg 18 consultation nearly 2 years ago. Our comments remain very relevant and are re-submitted for the Reg 19 consultation.

The Local Plan leaves a real vacuum in respect of the town centre and leaves it vulnerable to uncoordinated, opportunistic development. It will have no credible, well-articulated policies to forestall such development or any distinctive guide for development that will ensure the long run sustainability of the town centre and its economy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8852</th>
<th>Respondent: 15062081 / Chris Heath</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

This site was not given the consultation required.

It was added in an underhand manor and slipped in at the last minute to 'hide it' from local people and there right to comment. The borough councillor's from the Guildford Green Belt Group and Lovelace where treated in a terrible manor due to their rightful objections at the meeting held a week ago and I feel an apology should be given at the least. A full consultation under regulation 18 should be applied as it was only put in last minute, not the cheeky undemocratic regulation 19.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6300</th>
<th>Respondent: 15062625 / Stephen Groves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7275</th>
<th>Respondent: 15063745 / John Pryce</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall, I object to the disproportionate amount of development planned for this one area of the Borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/729</th>
<th>Respondent: 15081569 / Gary Cable</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>* The number of homes is way too many (even more so now with Brexit) - Village infrastructure can only cope with small developments under 50 homes not 400 plus industrial.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16199</th>
<th>Respondent: 15084545 / Andrew Wilton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The site Allocations list totals 12,698 The Site Allocations list totals 12,698.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4746</th>
<th>Respondent: 15084897 / Save Send Action Group (Andrew Procter)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section page number</th>
<th>Document page number</th>
</tr>
</thead>
<tbody>
<tr>
<td>919 of 1722</td>
<td>1620</td>
</tr>
</tbody>
</table>
7 POLICY S2 PLANNING FOR THE BOROUGH

7.1 I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

7.2 The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high

7.3 I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

7.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

7.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

7.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

7.7 A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

7.8 The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

7.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

7.10 NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s
estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

7.11 A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

7.12 The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because: 1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford. 2. there should be no increase for affordability above basic demographic change. 3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market. 4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

7.13 Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

7.14 The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

7.15 It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

7.16 The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

7.17 Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

7.18 The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

7.19 Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/688  Respondent: 15084897 / Save Send Action Group (Andrew Procter)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

1.1 I object to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

1.2 The OAN “objectively assessed need” figure of 12,426 is far too high

1.3 I am very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.4 Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%.

1.5 Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

1.6 However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

1.7 A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum.

1.8 The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

1.9 The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

1.10 The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford.

1.11 The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.
1.12 The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year.

1.13 If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580.

1.14 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

1.15 Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

1.16 Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400.

1.17 I object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

1.18 GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

1.19 GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted.

1.20 House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

1.21 “The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006)

1.22 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

1.23 This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes.

1.24 All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
1.1 I object to the Guildford Borough Council (GBC) Regulation 19 draft plan 2017 because it is not sound and the changes do not take account of my previous objections or indeed the 32,000 other valid objections that are shown on the GBC website and made to the previous 2016 version.

1.2 I have focused, as requested, on changes to which I find reason to object but this also includes some deletions which lack acceptable justification.

1.3 I request a confirmation by email from GBC that all of the objections to changes made below are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and that all my previous objections to the 2016 draft plan will be placed before the inspector.

1.4 I formally request the opportunity to give evidence in person at the Public Inquiry currently planned for 2018 in relation to my objections in 2016 and 2017.

1.5 I request again that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

1.6 I am of the opinion that if it is submitted in its current form it will be in risk of being summarily dismissed and put back to the Council for resubmission.

1.7 Guildford is a constrained borough by the reality of having 89% of its area zoned as permanent Green Belt and an out of date road network that is already at capacity. I am concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

1.8 70% of the new development proposed in this plan is in the permanent Green Belt which was coincidentally invented in Guildford under a private Act of Parliament in 1938. It is perhaps ironic that the process of Town and Country planning has become a type of Town v. Country debate.

1.9 The population in the borough is split equally between town and country but Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking have experienced. It is informative that Woking is currently outperforming Guildford in terms of economic performance.

1.10 It is interesting to note that urban densities in Guildford town are no higher than the villages that surround it. Even though the latter are in the main in the Green Belt which is protected from development and the former is in an area where there is no presumption against development. I am of the opinion we need a rebalancing between town and country and much more development in Guildford town, particularly residential development.

1.11 In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this
latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

1.12 GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.

1.13 The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1.14 I am concerned that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

1.15 In my opinion much of the updated local plan still appears out of date. It is like a voice from the past. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

1.16 Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health.

1.17 There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians.

Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt.

Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

1.18 I regret that my conclusion is that this plan is a clear example of bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9000  Respondent: 15098945 / ALISON TURNER  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council have not followed correct I strongly feel the council has totally disregarded resident views. The 2014 proposal for 430 houses went down in April 2016 to 185 and now I see it has gone up again to 485. These huge changes should go to full consultation under Regulation 18, not the shortcut of Regulation 191 This makes a mockery of the whole process.

It is very upsetting for our community that GBC are considering the above, I do hope that consideration will be made to the outstanding beauty of our countryside, our historic links and our wildlife and that our Green Belt protection is upheld.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/49  Respondent: 15099265 / Andrew Crawford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8906  Respondent: 15107297 / Ian McQuattie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12128  Respondent: 15107777 / Paul Ayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2813  Respondent: 15109537 / Elizabeth Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/183  Respondent: 15111873 / Cindy Knight  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/231</th>
<th>Respondent: 15114145 / Barry Roads</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>**Document: ** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/189</th>
<th>Respondent: 15111905 / Wendy Reed</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>**Document: ** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>2) I object to the size of the proposed sites at Garlick’s Arch, Wisley Airfield and Gosden Hill – too many houses in a relatively small area of the A3.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/233</th>
<th>Respondent: 15114145 / Barry Roads</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>**Document: ** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>1. I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
1. I object to further large developments due to the greater levels of air pollution that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/235  Respondent: 15114529 / Phil Vowels  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Why is it proposed to build so many homes in such a small area? 40% of the new housing in a 5-mile area – a totally unjust proportion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/238  Respondent: 15114657 / Jane Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/240  Respondent: 15114721 / Leslie Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3 I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/242  
Respondent: 15114721 / Leslie Macnair  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3 I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/244  
Respondent: 15114753 / Lauren Pott  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object most strongly to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/270  
Respondent: 15122049 / Rebekah Day  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. Unbalanced allocation of development in one area of the Borough

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/276  
Respondent: 15127649 / Neil Blaydon  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT TO the disproportionate amount of development in one area of the Borough.
2. I OBJECT TO the limited consultation period which has been allowed for the Draft Plan.
3. I OBJECT TO the last minute inclusion of new sites, such as A434 Garlicks Arch, with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPP16/277  **Respondent:** 15127681 / Claire Long  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I should like to OBJECT to the new local plan for East & West Horsley, published on 6th June 2016 as I feel the plan as a whole is unfairly skewed towards an essentially rural portion of the borough that lacks sufficient infrastructure (particularly roads, medical facilities and primary schools) to support this proposed level of development, particularly when taken in the context of the threat of the Wisley Airfield development which remains an overhang on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

---

**Comment ID:** PSLPP16/279  **Respondent:** 15127713 / Emma Connors  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.
I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than two weeks notice.
I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

---

**Comment ID:** PSLPP16/4519  **Respondent:** 15127777 / Keith Hammond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.
I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than two weeks notice.
I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
East Horsley village shops and local parking

East Horsley Station Parade village shops provide a vibrant selection of shops. Parking here is very well balanced. It is operating at nearly full capacity much of the time, but usually it is possible to find a parking space. Occasionally you may have to drive around a loop a second time, but even if full someone is usually leaving as you arrive.

533 extra houses in the two Horsley villages will render this in operable. It must be obvious that the addition of only a few extra cars at any one time will tip the parking over the limit and it must be completely obvious to anyone that 533 will introduce more than this at most times of the day.

In addition it is completely naive to think that the 2000 plus new homes at Wisley will all leave the new location via the A3/M25. They will clearly clog up East Horsley and West Horsley (as well as Cobham, Effingham, Ripley, etc, etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5932</th>
<th>Respondent: 15127809 / A W Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as i t has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/283</th>
<th>Respondent: 15127969 / Jean Fawley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the limited consultation period.

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/291  Respondent: 15128641 / Caroline Dixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH

I OBJECT TO THE LIMITED CONSULTATION PERIOD

I OBJECT THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN TWO WEEKS NOTICE

I OBJECT THE LACK OF ANY EVIDENCE FOR THE ALLEGED HOUSING NEED NUMBERS

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5933  Respondent: 15129441 / Janice Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/306  Respondent: 15131777 / Angela Wackett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the latest version of the local plan.

Guildford Borough Council intend to build 13860 houses with four developments exceeding 1000 houses. 70 percent of these on Green Belt land.

This proposal is massively out of proportion for Guildford and a much larger plan than any other borough in Surrey.

No constraints apply to this plan (as allowed by the National Planning Policy Framework) to take into account protected wild areas, Green Belt, flood risk or significant infrastructure constraints, all of which apply to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/308  Respondent: 15131841 / David Wackett  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council intend to build 13860 houses with four developments exceeding 1000 houses. 70 percent of these on Green Belt land.

This proposal is massively out of proportion for Guildford and a much larger plan than any other borough in Surrey.

No constraints apply to this plan (as allowed by the National Planning Policy Framework) to take into account protected wild areas, Green Belt, flood risk or significant infrastructure constraints, all of which apply to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9688  Respondent: 15132769 / Nicky Andrews  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Guildford Borough Council intend to build 13860 houses with four developments exceeding 1000 houses. 70 percent of these on Green Belt land.

This proposal is massively out of proportion for Guildford and a much larger plan than any other borough in Surrey.

No constraints apply to this plan (as allowed by the National Planning Policy Framework) to take into account protected wild areas, Green Belt, flood risk or significant infrastructure constraints, all of which apply to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed development will increase additional traffic onto the local roads, which are already busy and suffer from much congestion. I object to further development that will increase traffic in and around our villages. With more traffic, air pollution will increase. I object to further development which will result in poorer air quality, which in turn can effect the environment and local residents health. Many of the strategic sites, eg Wisley Airfield and Garlicks Arch, do not have local railways within easy walking distance, nor do they have a good bus service. Leaving residents with little option but to get in their cars, resulting in yet more traffic, congestion and drop in air quality. I object that these sites are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
f. I object to the disproportionate amount of development proposed for this area of the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID: PSLPP16/911  Respondent: 15136513 / Ian Mitchell  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the disproportionate amount of development in one area of the borough  
2. I object to the limited consultation period  
3. I object to the last minute inclusion of new sites with less than two weeks notice

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID: PSLPP16/9404  Respondent: 15136641 / Jason Dack  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID: PSLPP16/381  Respondent: 15136737 / D Padgett  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development proposed for this area of the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
f. I object to the disproportionate amount of development proposed for this area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/392  Respondent: 15137409 / Mark Costello  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/406  Respondent: 15137825 / Lianne Sherlock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is a hugely disproportionate development for one area of your Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/412  Respondent: 15137921 / Jean Sylvester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Following the publication of the New Local Plan I would like to make the following comments:

The total number of houses proposed for East and West Horsley is totally disproportionate to the size of the existing villages. Unless new provisions are made before any houses are built the local schools and medical centre will be unable to cope with the vast increase in residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/418  Respondent: 15138049 / Mark Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough, we have had enough done our bit

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8021  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10920  Respondent: 15138273 / David Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The number of houses planned has risen to 693 houses per year over the next 20 years (compared with 652 per year in the 2014 Draft) and is more than double the 322 houses per year that was approved in the 2003 Local Plan

65% of new houses in the Borough are to be built on land that is currently in the Green Belt.
When my family and I moved to the area we did so because of the village life style, and proximity to the green belt and rural environment. The local amenities cannot cope with such a large planned expansion and it would completely alter the place that we chose to make our home. At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In response to the new plans for Send, I wish to object to the fact that the plans that include Send and the surrounding area will have approximately half of the new buildings proposed for the whole of Guildford Borough. (policy S2 page 26)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/424  Respondent: 15138433 / Sylvia Pyne  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2,000 houses proposed for Wisley (policy A35 pages 124 and 203) and the 2,000 houses for Burpham. (policy 25 pages 124 and 225) Again they will be coming through Send Road (A247) and the roads adjoining will be gridlocked. We are a small village and the reason people move here is for the open aspect, which is also part of the "lungs for London". The pollution will make life very difficult for asthmatics like me who live on the main road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9757  Respondent: 15140225 / Stephen Reed  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the planned development in one area of the borough which cannot sustain this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9708  Respondent: 15140417 / Jeff Greenwood  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate amount of development in one area of the Borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/440</th>
<th>Respondent: 15140481 / Jayne Grant</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

3) I object to the disproportionate amount of development in one area

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/441</th>
<th>Respondent: 15140481 / Jayne Grant</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Many of us already suffer with breathing problems and the increase in the amount of fumes from cars will affect this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9731</th>
<th>Respondent: 15140641 / Sandra Greenwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development in one area of the Borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10869</th>
<th>Respondent: 15140705 / Simon Moxon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The disproportionate size of development sites in relation to the rural locations, in particular the Garlicks Arch proposal in Ripley. A development of this size will have a permanent and detrimental affect on our community for all the reasons listed above.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/473</th>
<th>Respondent: 15141281 / Robert Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposed disproportionate amount of development in one area of the Borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/475</th>
<th>Respondent: 15141409 / Barry Summerfield</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in one area of the borough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/478</th>
<th>Respondent: 15141409 / Barry Summerfield</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/480  Respondent: 15141633 / Bav Majithia  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The disproportionate amount of developments suggested in one area of the borough I strongly object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/491  Respondent: 15141953 / R Pomphrey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/497  Respondent: 15142977 / Paulina Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Another fact I would like to raise is regarding the unbalanced allocation of development in one area of the Borough. The proposed 6500 houses to be built between M25 and Burpham represent more than 40% of the housing in the Local Borough. I object to one area being hit so hard, and the impact it will have on the local residents.

I really hope that the common sense will prevail at the end and the local development plans will be adjusted considering not only the impact on the residents of the area, the local traffic, but also preserving the natural environment.

Please make my comments available to the Inspector.
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/500</th>
<th>Respondent:</th>
<th>15143073 / Sharon Rankin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in one area of the borough</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/507</th>
<th>Respondent:</th>
<th>15143297 / Ronald Mounsey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I OBJECT to the disproportionate amount of development in one area of the Borough.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/509</th>
<th>Respondent:</th>
<th>15143393 / Susan Mounsey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I OBJECT to the disproportionate amount of development in one area of the Borough.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/512  Respondent: 15143553 / Danielle Rixon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the large amount of development planned in one area within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10864  Respondent: 15143681 / Mark Clover  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I appreciate that Send needs to play its part in filling the need for housing, but this is a clear case of overdevelopment! Get this wrong and village life and all it brings will be lost forever, in the name of wealth and greed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/532  Respondent: 15144065 / Margaret Heard  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The already overcrowded roads, will potentially see thousands of additional cars and commercial vehicles flood into the villages, where the lanes were never designed to accommodate them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This brings with it the problem of pollution, which is a particular problem for the young and elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/544  Respondent: 15144225 / Donald Pitts  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the size of the developments proposed for a rural location
2. I object to the unbalanced allocation of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/548  Respondent: 15144545 / Stacey Maxwell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Disproportionate size of proposed development to size of villages
   I STRONGLY OBJECT to the size of the proposed developments (e.g. Wisley Airfield, Garlicks Arch on the Ripley/Send border, Gosden Hill in Clandon). These developments are totally disproportionate to the rural villages and will have a catastrophic impact on the local communities. I moved to Ripley for the very reason it’s a small village, I have no desire to see it turned into a big town.

1. Unbalanced allocation of development in one area of the Borough
   According to the statistics, in the 5 miles between the M25 and Burpham, there is a proposal to build over 6,500 houses. This equates to over 40% of the housing proposed in the Local Plan, which is disproportionate to the rest of the Borough. This is totally unacceptable and I STRONGLY OBJECT to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/550  Respondent: 15144545 / Stacey Maxwell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Impact on air and noise pollution
   Increased traffic on the road will simply mean more pollution, both air and noise. For this reason, I STRONGLY OBJECT to the development proposed in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9401  Respondent: 15144545 / Stacey Maxwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18569  Respondent: 15144929 / Michael Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

> > I object to the local plan proposal to build so many houses in Send & Ripley area on green field sites as there are still quite a few brown field sites that could be built on.

> >

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1313  Respondent: 15145057 / Vincent Francois  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the number of homes (12,426) to be delivered by GBC over a 20 year period

- The infrastructure is not in place to support this number of homes.
- It would put unimaginable pressure on road capacity, schools, doctors' surgeries, hospitals and police. This proposal would mean an increase in population of 41% which is total unacceptable as the existing local road systems are already unsafe and not fit for purpose.

- Cycling along the narrow and winding roads or walking on the pavements is already hazardous. I do wonder is any councillor has tried walking or riding along the present roads. To widen the roads in the designated areas would mean knocking down existing homes.

Instead of spreading the load to cause minimum disruption, It would appear that GBC seems to be biased against this area as it has decided to dump -40% of its plan in one spot putting great strain on the existing facilities and residents. We are at the extreme end of the Borough and from our standpoint the councilors have decided on a solution that disrupts the minimum of its voters, overwhelms and annoys its existing residents. By disregarding the numerous objections sent to GBC it is demonstrating the bullying tactics of government representatives. If this is how democracy works it stinks.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/577</th>
<th>Respondent: 15145121 / Irene Francois</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Regarding the above plan proposed by Guildford Borough Council (GBC) I have several points that I wish to raise and a number of objections that I wish to be logged.

- Objection 1 (Policy 52). GBC in the 2014 consultation declared that their intention was to build 652 houses/year (between 2013-2033). Now in their most recent plan they are aiming to build 693 houses per annum. Ibis increased number would severely impact on our already congested roads, on GP surgeries, hospitals, schools and shows complete disdain regarding preservation of Green Belt land.
- Objection 2 (Policy P2). Ibis policy involves the creation of new boundaries to inset the villages of Send and Send Marsh/Burnt Common. Thus removing their Green Belt status. Can GBC really act with impunity when their proposal breaks this government's promise to "Protect the Green Belt"? Its removal would result in urban sprawl and gridlock. The Green Belt is also there for the purpose of access to clean air and to provide a safe habitat for wildlife.
- Objection 3 (Policy A43). The proposal, referred to as Garlick's Arch to build 400 homes and 7,000 sq.m space for additional light industry and warehousing. Ibis would lead to a 41 % increase in population in the area. The proposal is that these houses are to be built on the agricultural land based just outside the Send March/Burnt Common village boundary. Again, if this goes ahead it will result in filling our roads with more cars and HGVs. The arterial A3 autoroute and the surrounding roads are already operating at full capacity. Putting more vehicles on the road will result in intolerable levels of noise and unacceptable levels of pollution from nitrogen dioxide and other harmful pollutants.
- Objection 4 (Policy A43a). The addition of two more slip-roads to and from the A3 and the A247 (Oandon Road) again will result in total congestion. Send Road leading to Woking has resident's cars parked on either side of the road leaving a very narrow space for cars and vans to pass one another and in most instances one has to give way to oncoming traffic. This is also the case with Clandon Road which is narrow and winding and already operating at full capacity. These roads are dangerous to pedestrians crossing, cyclists, and for...
residents exiting from side roads. I can only assume GBC did not seek the advice of a road traffic consultant or they would not have arrived at such a ludicrous plan.

• Objection S (Policy A25). If the proposed 2,000 housing development goes ahead at Gosden Hill it will result in high visibility urban sprawl obliterating the rural nature of the area and have a massive negative affect on the A3 and local roads. Good regeneration planning requires ingenuity, empathy and the ability to adopt a holistic approach that satisfies the need for new housing and small business development whilst taking into account the needs of the resident population, the existing infrastructure and the need to preserve as much of the Green Belt as possible. These key features are missing from the GBC proposal..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Spatial Strategy and Sustainable Development

We agree with the strategy that directs development to those sites that are within and adjoin Guildford as the principal settlement within the Borough and which is clearly the most sustainable location for development. The proposed allocations of Gosden Hill (A25) and Blackwell Farm (A26) are recognized in principle as sustainable locations for growth, being well related to the main urban population and all of the services, infrastructure and facilities that Guildford provides and subject to consideration of detailed issues relating to each of these proposed areas.

While we offer no view on the details of these allocations, the principle of sustainable urban extensions is clearly established in the rationale for these sites.

This strategy helps support a wide range of services and facilities within the town, including comprehensive healthcare, social services, education, retail and leisure, employment and public transport. In focusing development in the principal town, the maximum benefit is derived, providing access within easy reach of the major part of the Borough’s population.

4.4.1 However, this strategy is not clearly or expressly stated in the rationale within the Local Plan and the strategy is not properly considered further in relation to the other opportunities to achieve similar sustainable urban extensions, such as Onslow Park.

4.4.2 Were this to be identified alongside these two proposed allocations, it would be entirely complimentary and consistent with their identification. Indeed it would add a further element to the sustainable spatial strategy, in supporting the funding of infrastructure necessary to support the wider aims of the Guildford urban area, which less sustainable, disconnected locations would not.

The Spatial Vision of the proposed Local Plan is set out on page 19 and commits as its starting point to meet the identified growth needs of the Borough. This is supported.

However, neither this Spatial Vision, nor the subsequent Core Themes, appear to contain any overarching spatial strategy that recognizes the role of Guildford as the principal town within the Borough and prioritizes this as the most sustainable location for growth. The only real reference is in retail terms.

As such the Spatial Vision and resulting allocations are inconsistent with national planning policy and are neither sound, effective nor properly justified.

Paragraph 6 of the NPPF comments on the role of the planning system:

“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”

Paragraph 17 of the NPPF sets out 12 core principles of the plan making process. This includes the principle to:

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”

We are concerned that this has not been fully considered or reflected in the spatial strategy of the Local Plan. As such, neither is it reflected in the proposed allocations made within the Submission Local Plan. This is a clear omission.

Paragraph 30 of the NPPF further elaborates on this, commenting:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”
This is clearly relevant to the spatial strategy of the Local Plan, which should seek to accommodate growth in and around those locations that are most sustainable and reduce the need to travel and optimize the use of pedestrian, cycle and public transport. This essentially requires a settlement hierarchy and as a matter of principle, the identification of growth in accordance with these sustainability aims.

This is further reinforced in paragraph 34 and 35 of the NPPF:

“34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

The Local Plan should encourage development in and adjoining the Urban Area of Guildford first. It may also be relevant to consider the next settlements in the hierarchy at Ash and Tongham and then the higher order villages. This should be according to a hierarchy that places Guildford at the top, as the highest order centre, the most sustainable centre and the preferred location for sustainable growth.

This was reflected in the initial stages of the Countryside and Green Belt Study which commented:

“It was originally considered that land parcels adjoining the urban areas of Guildford, Ash and Tongham may be more sustainable in terms of potential development (refer to Volume I, Section 6).”

Notwithstanding this view, the parameters of this study were though later refined by the Council to reflect their wish to consider villages and new settlement proposals (Wisley) also.

Paragraph 4.1.6 adopts a partial if somewhat unclear step in this direction, prioritizing previously developed land in Guildford town centre, urban areas, inset villages and Green Belt villages. It confuses however, the use of previously developed land (a policy that is also supported) with a sustainable spatial strategy, which is about access to housing, goods and services, reducing the need to travel and tackling the effects of climate change. No justification is given for the approach.

The paragraph and hence the Plan’s strategy appears to be at odds with the policies of the NPPF in having no consistent regard for sustainability and the spatial strategy this requires.

Indeed paragraph 4.1.8 incorrectly suggests these are all sustainable locations. What they are in essence, is simply locations that are within existing settlements but which have no regard for the relative sustainability as defined by Government or to other locations on the edge of Guildford that may be more sustainable.

Paragraph 4.1.8 therefore, fails to deal adequately or at all with sustainability or spatial prioritization in the release of land in the locations identified. It has no regard to the accessibility of the location or the degree to which there are real and genuine choices in the mode of travel and true accessibility to a wide range of goods and services. This would place urban extensions to Guildford and the other main lower order settlements above other remote locations away from established settlements and around villages. This is also at odds with the clear thrust of the NPPF.

It should therefore, be made clear that the most sustainable locations for growth are in and adjoining the urban area of Guildford. Onslow Park should, as such, be identified as a sustainable location for growth and identified as an allocation as part of a sustainable spatial strategy, in accordance with national policy.
Policy S2 Borough Wide Strategy and Housing Trajectory

Policy S2 commits to the provision of new homes and employment space within the Borough over the Plan period. The level of growth identified seeks to meet objectively assessed need (OAN) and hence meet the needs of the community for homes and jobs. This is supported.

The Submission Local Plan makes provision for the delivery of 13,860 new homes over the plan period (2013-2033). This equates to 693 dwellings per annum which matches the identified housing need through the SHMA based on 2012 projections. The draft Local Plan ties the proposed trajectory however, to the delivery of strategic sites, the rate of which is limited by infrastructure provision:

“The delivery of new homes is expected to increase over the plan period, reflective of timescales associated with delivery of strategic sites”.

However, as a result the trajectory identified within the policy (shown below) provides for a deficient level of housing within the initial 5 years of the Local Plan period post adoption an up to 2022/23, compounding the cumulative shortfall to date. The trajectory is well below the level required to meet OAN of 693 homes each year up until that point, based on the SHMA.

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Number</th>
<th>Year</th>
<th>Housing Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018/2019</td>
<td>500</td>
<td>2026/2027</td>
<td>700</td>
</tr>
<tr>
<td>2019/2020</td>
<td>550</td>
<td>2027/2028</td>
<td>700</td>
</tr>
<tr>
<td>2020/2021</td>
<td>600</td>
<td>2028/2029</td>
<td>785</td>
</tr>
<tr>
<td>2021/2022</td>
<td>600</td>
<td>2029/2030</td>
<td>790</td>
</tr>
<tr>
<td>2022/2023</td>
<td>700</td>
<td>2030/2031</td>
<td>790</td>
</tr>
<tr>
<td>2023/2024</td>
<td>700</td>
<td>2031/2032</td>
<td>790</td>
</tr>
<tr>
<td>2024/2025</td>
<td>700</td>
<td>2032/2033</td>
<td>790</td>
</tr>
<tr>
<td>2025/2026</td>
<td>700</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This shows that there is proposed to be an increasing level of delivery over time as the plan progresses through the plan period. On this basis, to ensure the minimum housing requirements of 693 dwellings per annum are to be delivered, the Plan seeks to counter a shortfall in the first 6 years of the Plan period with an increased trajectory in the final 5 years of the Plan period.

As the net completions table also shows, the first two years of the plan period 2013/14 and 2014/15 have delivered significantly fewer than 693 dwellings per annum. The previous interim housing figure of 322 dwellings per annum agreed on May 2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. Reliance on this figure has meant that the Borough has under-delivered even at this level on housing needs over the past five years:

<table>
<thead>
<tr>
<th>Year</th>
<th>Completions (net)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010/11</td>
<td>190</td>
</tr>
<tr>
<td>2011/12</td>
<td>262</td>
</tr>
<tr>
<td>2012/13</td>
<td>234</td>
</tr>
<tr>
<td>2013/14</td>
<td>137</td>
</tr>
<tr>
<td>2014/15</td>
<td>242</td>
</tr>
</tbody>
</table>
Within the Plan period in the last 2 known years 2013-15 this has resulted in a shortfall well below the 693 required each year, being little more than around 6 months supply in the last 2 years, with no identified strategy or basis to catch up until the final 5 year period to 2033. This is considered simply too late and it must be recognized that this continues the negative impacts of inadequate access to good quality homes to a degree that is simply not justified.

Important to the consideration of the robustness of the Local Plan is the requirement within the NPPF to plan positively to meet the objectively assessed needs of the area and to achieve sustainable development. There is now a positive approach to growth as stated within paragraphs 17 and 28 of the NPPF.

It is important to recognize that the housing needs identified within the Borough represent the needs of the community, if there is to be sufficient housing to meet the needs of the population, including starter homes, family housing, retirement and including specialist forms of housing and affordable homes. If these needs are not met then the community and parts of the community in particular, are denied access to good quality housing at a price they can afford, which in turn gives rise to unacceptable social and economic impacts for the Borough.

As the housing completions above show, Guildford has not only been under-delivering against the real need but there has also been consistent under-delivery against the interim housing target and no planned increase above the level needed until close to 2033.

The most recently produced Annual Monitoring Report (AMR), published in October 2015 for the period 2014/2015 showed that net completions of dwellings in the borough for this period was 242 and that the majority of homes completed in this period are on sites of under 20 homes. As the AMR advises:

“the number of new homes completed this year (2014/15) is still lower than required to meet our objectively assessed need…contributes to a growing deficit of new homes”.

The recommendation within the AMR following this states that:

“housing provision is currently restricted by the lack of available and deliverable development land in the borough…delivery rate is only likely to increase when larger areas of land are suitable and available for development”.

As such, there is a clear need for an immediate increase in the level of supply being achieved.

This required increase in supply should focus on available sites that are not unduly constrained in terms of their ability to come forward for development and that are located within the most sustainable locations. The main reason given for the failure to increase supply to the required level in the early years is the inability to deal with the infrastructure requirements that have been identified to accompany growth. The plan essentially adopts a supply approach predicated on the prior or contemporaneous delivery of supporting infrastructure.

This further supports the clear and pressing need for the identification of Onslow Park, given its ability to contribute immediately to the supply of homes in the most sustainable location and in accordance with a clear and sustainable spatial strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18694</th>
<th>Respondent: 15145377 / WYG (S Fidgett)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
Policy S2 ‘Borough Wide Strategy’

As detailed in Section 2 of our Statement we do not believe that the correct housing target has been adopted, and have serious concerns that the Local Plan does not provide for the Borough’s objectively assessed need in terms of the correct housing trajectory, meaning the Plan is deficient in supply for the major part of the Plan period. It is clear from the draft SHMA that the minimum housing number that should be adopted is 693dpa, though in reality a higher figure would make a real difference to meeting affordable housing need. It is also of concern that no specific need has been identified as being met for specialist forms of housing, such as retirement housing.

We do not agree with the development allocations in Table 1 – ‘Delivery between 2015 and 2031’. We believe that a new garden village and Sustainable Urban Extension to Guildford at Onslow Park should be included, in line with this submission. This would deliver approximately 1000 new market and affordable homes and would make a significant contribution to housing supply in the first part of the Plan period, recognizing the shortfall noted above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I live in Ripley and I strongly object to many parts of the new draft local plan for Guildford Borough.

1. **The draft plan places a massively disproportionate and unfair development burden on the portions of the Borough closest to London.** The plan indicates 689 new homes are required per year, and 13,860 new homes by 2033. Yet the Former Wisley Airfield/Three Farms Meadow site at Ockham is planned to have 2,200 properties. The Garlick’s Arch proposal adds another 400 houses. The Gosden Hill Farm plan for West Clandon adds another 2,200 houses. Together, these projects represent over 33% of the requirement for the entire borough for the next 16 years, and this does not even include the smaller developments. This is entirely disproportionate, particularly to the Lovelace Ward. The Upshott Lane project adds another 400 houses, in the Borough of Woking but only minutes away from the developments above. It does not appear coincidental that the portions of these Boroughs closest to London are scheduled for overdevelopment to the benefit of areas further away. The draft plan explicitly states that GBC intend to build more new homes than is in the Policy, merely to provide ‘flexibility’. This is unacceptable and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **Environmental Impacts.** I already have grave concerns over the air pollution in this area and its impact upon both the rare habitats of the Ockham and Wisley Commons as well as vulnerable local residents including children and the elderly. This would only be increased by the additional and disproportionate development proposed for this corner of the Borough.

Please take into consideration my strong objection on the above grounds to the alteration of the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

4. **Environmental Impacts.** I already have grave concerns over the air pollution in this area and its impact upon both the rare habitats of the Ockham and Wisley Commons as well as vulnerable local residents including children and the elderly. This would only be increased by the additional and disproportionate development proposed for this corner of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** pslp171/1305  **Respondent:** 15147809 / Elmbridge Borough Council (Suzanne Parkes)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Guildford borough Proposed Submission Local Plan: strategy and sites (June 2017)**

Thank you for consulting Elmbridge Borough Council on Guildford Borough’s Proposed Submission Local Plan.

As you know, we are keen to work with you and other authorities within our respective areas to ensure the effectiveness of Local Plans including, ensuring that the best and most suitable sites are brought forward for development and that other cross-boundary and strategic planning matters are continuously addressed.

Given the focused nature of this latest consultation, this response is made at an officer level. As requested comments made in response to the previous Regulation 19 Consultation (June 2016) have not been repeated unless, they extend to any amendments now being proposed.

**Policy S2 – Planning or the Borough – our spatial development strategy**

It is acknowledged that the Proposed Submission Local Plan seeks to meet a revised housing need of at least 12,426 new homes between the amended period of 2015 and 2034. This is on the basis of the evidence contained within the West Surrey SHMA Guildford Addendum Report 2017. The number of new homes to be provided represents a decrease of 1,434 homes from that set out within the previous Proposed Submission Plan for which Guildford Borough Council proposed to meet.

It is understood that the land previously identified to accommodate the higher housing number has been revisited (Land Availability Assessment (LAA) and 2017 addendum). Notwithstanding the comments made in the document, it is considered that as this land was once identified as being available and developable it should be reconsidered and the potential for it to assist in meeting the unmet need across the housing market areas revisited.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/5326  **Respondent:** 15147841 / N Golbengian  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/645  Respondent: 15148705 / Catriona Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan on the grounds that:

- the proposed development is disproportionate to the capacity of the area affected to accommodate it
- amounts to an excessive development within one area of the Borough and
- is contrary to the Borough’s stated objective of ‘balancing the needs of residents with protecting the borough’s most important countryside, landscape and heritage’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12869  Respondent: 15150465 / L Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have viewed your plans for future development of Guildford with horror and beseech you to realise the damage that will occur to our lovely city environment should the expansion plan go ahead. The amenity of so much beautiful countryside surrounding Guildford would vanish, traffic would be much worse than it is at present, local services would be totally overloaded, i.e. doctors, hospital, surgeries, etc. Please, please reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/658  Respondent: 15150593 / Janna McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
3. The disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/690  Respondent: 15154241 / Brendan Laing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/696  Respondent: 15154593 / Linda Davis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Process

I object because Guildford Borough Council has not followed the correct process in including the above proposals in the Draft Plan. These are significant changes requiring consultation under Regulation 18, not the Regulation 19 process.

Evidence

I object because:
- Guildford Borough Council’s Transport Assessment was not available to councillors for the vote taken on 24 May on the Draft Plan. Insufficient attention has been given to Infrastructure overload;
- Guildford Borough Council have not demonstrated the need to build on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/694  Respondent: 15154625 / Jacky Sutton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/703  Respondent: 15154849 / Julia Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

1. I object to the building of homes without due thought for school journeys. These represent a large proportion of traffic during rush hours, and the dependency of our children on parents to ferry them around. We should encourage housing to be built near schools or new schools to be built so that children can travel short distances by green transport.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/715  Respondent: 15154977 / Janine Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
6.) The Borough Wide Strategy (Policy S2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the Guildford Local Plan for the following reasons:

...

10.) The poor air quality pollution concerns (Policy I3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/748  Respondent: 15156961 / Polly Nicholson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I appreciate that you and your colleagues have a terribly difficult job accommodating everybody's needs but I am deeply saddened by the amount of building that has gone on during my lifetime in the Guildford area. As a society we tend to all be in agreement at our outrage in the destruction of the world's rainforests but seem to be ignoring the destruction of our own countryside. Please, please consider reducing the amount of building before our homeland is destroyed.

Sorry to spoil your Monday morning. I'm sure you're a lovely person but feel the need to speak out about something I feel so passionately about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/751  Respondent: 15157089 / Louise Duncan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object on the grounds that they are a disproportionate development in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/753  Respondent: 15157089 / Louise Duncan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I most strongly object to the inevitable increase in air pollution & noise. Higher levels of both will be a serious threat to health & well above acceptable levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016). And these are my reasons:

1. I object to the number of houses needed. After the EU referendum I do not believe the proposed housing numbers are still valid. I would like to see a revision to these numbers for the Guildford Borough.

1. I object to the irreversible damage building new homes on woodland and farmland will create. A combination of brown field sites (burnt common) and small infill sites (Anderton's Farm) are available but have not been considered by the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/786  Respondent: 15157665 / James Laing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the borough wide strategy. We should not be increasing our dependency of cars to move around by building greenbelt housing, and therefore we should be building housing near existing railway stations, or other green transport such as bikes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/799  Respondent: 15159873 / Martin Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH

1. I OBJECT TO THE LIMITED CONSULTATION PERIOD

1. I OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

Our legacy should not be to destroy the special villages and countryside environment we have all chosen to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17367  Respondent: 15159873 / Martin Smith  Agent: Vail Williams LLP (Jane Terry)
Policy S2 states that the Plan is based on national planning policy with recognition of environmental constraints and the availability and viability of land for development. The preference for growth is in the most sustainable locations making the best use of previously developed land (including in the Green Belt if necessary).

The general principle set out within Policy S2 is supported. The use of areas least impacted by environmental constraints is also supported, as is the use of Green Belt land where necessary to deliver sustainable development to meet the required growth needs of the Borough.

However, the Plan does not go far enough in exploiting the sustainable locations of the Borough. The Green Belt Study is a key part of the evidence base which has influence the identification of potential development areas. We consider much of the Green Belt Study to be unjustified and as such the Plan is not effective.

Much of the housing development identified through the Plan is to be delivered through strategic sites. Whilst it is recognised that a significant amount of development within the Plan period will need to come forward through such sites, these are notoriously difficult to deliver in a timely way and are often subject to delays due to reasons of land assembly and the provision of the up front infrastructure required. As such, and in order to maintain and deliver a robust supply of housing land, a significant number of smaller sites which are unconstrained by environmental, ownership or infrastructure, and which can therefore be brought forward quickly and easily in the early years of the Plan should be allocated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/802</th>
<th>Respondent:</th>
<th>15159905 / Vicky Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH
2. OBJECT TO THE LIMITED CONSULTATION PERIOD
3. OBJECT TO THE LAST MINUTE INCLUSION OF NEW SITES WITH LESS THAN 2 WEEKS NOTICE

2. Our legacy should not be to destroy the special villages and countryside environment we have all chosen to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/805 | Respondent: | 15159969 / Jonathan Cini | Agent: |
I would like to object to the above plan.

I object to:-

1. The number of homes being proposed
2. The enclosure of protected green belt land within the proposed new village boundaries
3. The Garlick’s Arch proposal to build 400 new houses and 7000sq.mt. of light/general industrial/storage distribution space on the green belt
4. The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon road at Burnt common
5. The wholesale destruction of the green belt in this area (including the planned development of 2000 houses at Gosden Hill Farm, Merrow in clear contravention of the governments stated commitment for green belt protection.
6. There being no provision to provide schools in an area already desperately short of this facility
7. No provision for improved road networks which are notoriously bad in the area.
8. No provision for improved and sufficient medical resources in the area.
9. No consideration for and improvement to the infrastructure including the provision of sufficient water and other supplies
10. The destruction of villages which have existed for hundreds of years
11. Further development in the South East especially in an area already over populated
12. The council proposing these plans without a clear mandate from the electorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to your recent plan dated 6th June 2016, I would like to voice my strongest disapproval.

We hold a position just off 2 major thoroughfares (A3 and M25), with a good balance of small local shops to serve the small community, and I and neighbours strongly believe that there are not enough amenities nor infrastructure to cope with the surge in proposed development, as well as the surge in construction traffic considering that will more than likely not be using those 2 major roads; hence we will be trapped in a traffic nightmare for the length of construction!

In view of the latest Brexit Vote, in which our migrant population should be reduced, and a likelihood of a dip in National and Local GDP, I cannot see for a need to build so many new houses, firstly without a massive burden on indigenous Horsley Villagers, from a Financial perspective, and lastly from a necessity point of view.

I urge you and the Guildford Borough Council to reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not want more building in this area. I am having trouble breathing now. Yes, I have a council flat and when I die someone else can have my flat so stop selling council property. These were built for the working man and should be kept as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/869  Respondent: 15172705 / Geraldine Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am raising objections to the Local Plan. It's far too much building with the infrastructure we have at the moment. I agree that we could do with some more houses, flats and bungalows for the disabled, but these should be council owned for the average working man. About 200 per village should do it. More cars mean traffic pollution and I suffer badly from air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1061  Respondent: 15174145 / Kathleen Mylet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I object to the poor quality of air concerns. (P13)

Noise and air pollution is already bad.

With the additional houses being built and resultant extra traffic likely to cause extremely poor air quality to residents in properties adjoining Portsmouth Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/887  Respondent: 15175905 / Alison Bytheway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I must protest with the loudest voice possible, that the plans to build 14,000 more houses be refused.

Guildford cannot cope, there is insufficient infrastructure, not enough school places (or teachers), enough doctors to fill vacancies in GP surgeries. The roads cannot cope, it took me 50 minutes the other day to go from Merrow to the A3 via Ladymead.

These plans are untenable and MUST be stopped.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/889  Respondent: 15176097 / W J Wortt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have recently been reminded that included in the local plan is the proposal to build an additional 14000 homes within the borough.

I have several objections to this:-

1/ None whatsoever should ever be built on land designated as Greenbelt. This will ruin the existing beauty of the borough.

2/ The additional housing is not what the existing residents want, it will lead to overcrowding and the existing infrastructure cannot cope. It would be far better to let people live in plentiful existing housing which is available in other parts of Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/891  Respondent: 15176161 / Linda Fielding  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

I object to the limited consultation period.

I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/902  Respondent: 15177345 / Amer Sarssam  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my objection to the 2016 Draft Local Plan.

I make the following points:

1. Erosion of the green belt
2. Lack of adequate consultation
3. Insufficient schooling
4. Insufficient transport
5. Insufficient health care
6. Environmental impact on Papercourt Sailing Club, an SSSI area
7. Impact on Papercourt Sailing Club lake water level and water table

Please confirm receipt of this communication and keep me appraised of the decision making process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/904  Respondent: 15177473 / Judith Sarssam  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my objection to the 2016 Draft Local Plan.

I make the following points:

1. Erosion of the green belt
2. Lack of adequate consultation
3. Insufficient schooling
4. Insufficient transport
5. Insufficient health care
6. Environmental impact on Papercourt Sailing Club, an SSSI area
7. Impact on Papercourt Sailing Club lake water level and water table

Please confirm receipt of this communication and keep me appraised of the decision making process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/915  Respondent: 15178113 / Jack Hornblow  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/925</th>
<th>Respondent: 15178241 / Emma Pink</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) disproportionate amount of development in one area of the borough
4) limited consultation period
5) last minute inclusion of new sites with less than 2 weeks to go

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/926</th>
<th>Respondent: 15178369 / Geoffrey Wilkinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please take this email as my extremely strong objection to the notion of building houses on any part of the greenbelt or countryside in the Guildford area.

I understand that more houses need to be built, but only on brown sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the 2016 Draft Local Plan on the grounds that:

- infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.
- the proposed development is disproportionate to the capacity of the area affected to accommodate it
- amounts to an excessive development within one area of the Borough and is contrary to the Borough’s stated objective of ‘balancing the needs of residents with protecting the borough’s most important countryside, landscape and heritage’.

In particular, I object to the following proposed sites and developments:

- Policy A43 Garlick’s Arch plus Clockbarn Nurseries and Send Hill; they are not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
• Policy A35 Wisley; it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads.
• Policy A25 Gosden Hill Farm Merrow; infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels.
• Policy 43A - the proposed new interchange onto the A3 at Burnt Common.

The combined effect of these substantial proposed developments within close proximity will place an unsustainable burden on the infrastructure of the areas affected. The surrounding roads are already extremely busy and in particular the resulting increase in traffic on the A3 and M25 will be disastrous. The A3 is already at a near standstill on the approach to the M25 during the morning peak time and this will become substantially worse by the construction of upwards of four and a half thousand houses, plus commercial/industrial units on these three sites combined. In addition, this will particularly result in the village of Send being gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1192  Respondent: 15180193 / Paul Bedworth  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6.) I object to the disproportionate amount of development in one part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/933  Respondent: 15180929 / Torkil Fredborg  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

It is understood that the main expansion of new homes should be in vicinity to the Guildford urban area whilst the surrounding villages take their fair share of new homes which may be relatively smaller. However when it comes to th town centre itself, I do not believe there is capacity to expand the number of homes to th extend planned. Guildford town centre already has an overweight of smaller homes and the only way such new expansion could be feasibly done is to provide more single occupancy homes rather than th family homes the borough needs. In addition, with traffic already very congested, it does not appear sound to expand the number of homes so dramatically in th town centre but again, the surrounding areas would better cope with the demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/938  Respondent: 15183393 / D Greenman  Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>
|  | The proposal for 430 houses in 2014 was reduced in April 2016 to 185. Now GBC have increased the number of houses once again to 485 plus an industrial site and gipsy encampment. These changes require full consultation under Regulation 18. GBC are now trying to short cut the consultation via Regulation 19. This action completely invalidates any consultation with residents of Send.  
Any new homes should be built on brown field sites outside of the village, not on green belt.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |  |
| **Attached documents:** |  |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/947  Respondent: 15184289 / V H Wood  Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>
|  | Objection to Guildford Borough Council Proposed submission Local Plan June 2016.  
I object to the Local Plan as the development proposed will not be sustainable.  
The development of 1,300 homes during the [text unreadable] period. It will have a permanently detrimental impact on existing local communities by over development, particularly villages between Guildford and the M25, including Ripley, Send and Clandon.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |  |
| **Attached documents:** |  |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/958  Respondent: 15184289 / V H Wood  Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>
|  | I object to the Borough [text unreadable] Strategy (Policy S2).  
It is clear that it is not a [text unreadable] with disproportionate development in the north east of the borough resulting from the allocation Wisley airfield (A35) Garlick Arch on Ripley and Send border (A43) and Gosden Hill (A25) as major residential sites.  
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |  |
G. I also object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. This volume of housing is disproportionately high at 36% of plan’s new housing in an area which currently has 11%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the draft Local Plan for the following key reasons. I object to the lack of protection for Green Belt, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. I object to disproportionate housing development in our area, over-loading schools, health services and public transport including stations.

I object because of the huge increase in traffic on narrow rural roads, trunk roads & lanes which already suffer severe congestion, to say nothing of the danger this will cause to local cyclists and pedestrians. I object because of the air pollution from thousands of extra cars affecting children & elderly people. I object to the continued inclusion of FWA/TFM where the planning application was unanimously rejected by GBC's Planning Committee. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site in relation to SPA, SSSI & SNCI. I trust that my objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35 is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/980  Respondent: 15186657 / Philip Boast  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I'm writing to you with reference to the proposed building of many houses on our GreenBelt land.

I want to strongly object to ALL erosion of our GreenBelt and the building of anything on green field sites. Our county and country are being ravaged by development.

I object to site A43 Garlicks Arch

I object to site A45 The Talbot - it's a conservation area!

I object to site A57

I object to the last minute inclusion of new sites with little notice.

New schools? New medical facilities? Where is the provision for these?

Our GreenBelt is a precious recourse and should not be abused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/982  Respondent: 15186721 / Luigi Galgano  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I strongly object the following: -

Clay Lane Link Road.

Jacobs Well being removed from the green belt.

Building more homes and offices on Guildford countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1024  Respondent: 15189377 / Anne Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I agree with the policies S1, P1, P3, P4, P5, D1, D2, D3, H3 & I4.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1025  Respondent: 15189377 / Anne Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion, I do not believe that there are sufficient differences between this version of the local plan and that which was firmly rejected by local people when put out to consultation in 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1032  Respondent: 15192257 / Jennifer Cliff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1037  Respondent: 15192545 / M & JB Koskela  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1038</th>
<th>Respondent:</th>
<th>15192545 / M &amp; JB Koskela</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

Traffic concerns on trunk roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1039</th>
<th>Respondent:</th>
<th>15192545 / M &amp; JB Koskela</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

Air pollution from thousands of extra cars, affecting children and the elderly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8383</th>
<th>Respondent:</th>
<th>15195617 / Scott Brownrigg Planning (Natalie Walter)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( No ), is Legally Compliant?</td>
<td>( )</td>
<td></td>
</tr>
</tbody>
</table>

The strategy put forward is unsound due to over-reliance on "Land at former Wisley airfield, Ockham." Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3256</th>
<th>Respondent:</th>
<th>15195617 / Scott Brownrigg Planning (Natalie Walter)</th>
<th>Agent:</th>
<th>Land Owner of Hornhatch Farm</th>
</tr>
</thead>
</table>
Our client is the landowner of “Land at Hornhatch Farm, Chilworth.”

Our client notes that the proposed housing target has been reduced in the latest consultation document and considers that there is a need for delivery of housing sites within the first five years of the plan period. Smaller sites around villages would contribute to this early delivery without compromising the overall spatial strategy proposed.

Paragraph 6.6.15 of the Sustainability Appraisal Update notes that there is a pressure to allocate sites that are able to deliver in the first five years and that smaller sites at villages tend to be relatively easy to deliver. Our client agrees that smaller sites would be relatively easy to deliver, in particular, “Land at Hornhatch Farm.”

Our client notes that paragraph 6.6.16 of the Sustainability Appraisal Update then states:

“In the light of this factor, there is a need to consider the option of allocating additional village sites. The following sites comes into contention…

Site I- Hornhatch Farm, Chilworth (80 homes)… see further text in Box 6.10.”

Our client further notes that Box 6.10 ranks Hornhatch Farm higher than previously, as two other sites in Shalford Ward have been ruled out (one is constrained by access and the other is in the AONB). This ranking ahead of the two other sites in Shalford Ward is considered to be appropriate.

Our client has considered the growth options set out in the Sustainability Appraisal Update and notes that Hornhatch Farm is included in options 2, 5, 6 and 8. Our client considers that option 2, which includes Hornhatch Farm, would be a more appropriate strategy for the Borough which would contribute to meeting housing need in a more appropriate way, whilst taking into account the environmental and other constraints within the Borough.

Allocation of “Land at Hornhatch Farm” would form a sustainable extension to Chilworth. The site was previously assessed in the 2014 “Draft Guildford Borough Local Plan: Strategy and Sites” as suitable for residential development within one to five years. The site is located in Environment Agency Flood Zone 1 (low risk of fluvial flooding) and is within 5 to 7km of the Thames Basin Heaths Special Protection Area (SPA) and therefore is beyond the zone of influence of this SPA. The site is within single ownership, is available now and development would be achievable in first five years of the plan period. It would thus contribute to much needed early delivery of housing.

Our client considers that smaller sites around villages would contribute to early delivery of housing in the plan period without compromising the overall spatial strategy proposed.

Land known as “Land at Hornhatch Farm” has been ranked more favourably in the Sustainability Appraisal of the Guildford Local Plan Update 2017 and our client agrees with this ranking ahead of two other sites within the Shalford Ward.

Growth option 2 in the Sustainability Appraisal Update would represent a more appropriate strategy for the Borough and allocation of the site for residential use would have the benefit of bringing forward a deliverable sustainable extension to Chilworth that would contribute to providing much needed housing in Guildford Borough within the first five years of the plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

1. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

1. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Disproportionate level of development in a single area - why is it necessary to build a new village at Gosden Hill (2000 houses) that will not have the appropriate infrastructure to support it. 1800 at Blackwell Farm, 2000 at Wisley, 500 at Garlick's Arch and more importantly 1000 at Slyfield which could well turn into 1700 is not appropriate. Slyfield is also dubious as a site because of what is buried beneath the land, and the risk of flooding.
- Consultation period - this is very limited and it would appear that the council are rushing things through without proper thought. Making a decision on the plan before the tunnel under Guildford has been properly assessed/agreed seems ludicrous. There will be a creation of so much traffic before a solution has been agreed to deal with the said traffic.

For the above reasons and more, I object to the Guildford Plan. The level of housing being suggested is double what was originally mooted and I feel is not appropriate for Burpham and the surrounding areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1147</th>
<th>Respondent:</th>
<th>15196481 / Toby Horn</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>Sound?</strong></td>
</tr>
<tr>
<td>I object to the 2016 draft local plan due to:</td>
<td></td>
<td>Brexit and the expected reduction of demand for property, and the lack of evidence for alleged housing need numbers.</td>
<td></td>
<td>Loss of Green belt</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1150</th>
<th>Respondent:</th>
<th>15196513 / Alison Precious</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>Sound?</strong></td>
</tr>
</tbody>
</table>
1. I object to the disproportionate amount of development in one area of the Borough.
2. I object to the limited consultation period.
3. I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1171  **Respondent:** 15198081 / Anita Hogben  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT TO** the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1182  **Respondent:** 15198337 / Jack Tallick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1189  **Respondent:** 15198401 / Tony Porter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
• I OBJECT TO the disproportionate amount of development in one area of the Borough
• I OBJECT TO the limited consultation period
• I OBJECT TO the last minute inclusion of new sites with less than 2 weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1479  Respondent: 15198913 / Diana Gordon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1205  Respondent: 15205729 / John Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

GBC's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there's too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

You will have seen a thorough analysis of the objections to the Local Plan from Mr David Roberts of West Horsley. I have read the details of this document and would like to register my objections to the plan for the same reasons as set out in that document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

7) I OBJECT TO to disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7) I OBJECT TO to disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1282  
Respondent: 15208513 / Lauren Green  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I OBJECT TO to disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1285  
Respondent: 15208545 / Charlotte Green  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7) I OBJECT TO to disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1288  
Respondent: 15215841 / Andrew Boyce  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the massing of these new housing proposals in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16322  Respondent: 15216129 / Timothy Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16401  Respondent: 15216129 / Timothy Hewlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1294  Respondent: 15216225 / Robert May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Institute of Directors has supported the development of Borough’s Local Plan from when the process started in for the original plan period from 2011 to 2030 and now for the period 2013 to 2033.

I understand that after a great deal of hard work and significant consultation by officers and Member, the Council has now published its pre submission draft version of the plan.

Guildford is an important town in Surrey in which the Institute has a significant number of Members.
Particular features of the Plan which the Institute supports include:

- Improvement to the transport infrastructure in the town and in particular to the west of Guildford access from our County Hospital and the Surrey Research Park.
- Planning the provision of 13,680 houses across a range of tariffs and tenures in a number of strategic sites.
- The need to alter the green belt boundary to enable the provision of additional housing and choices of housing.
- It will help to support the educational base in the town.
- It will provide additional land for the growth of employment.
- There is a recognition in the plan of the importance of the employment base in the Borough and that this needs support if its strategic role is to be met fully.
- It meets national planning policy.
- It has been subject to intense scrutiny.
- It has the support of the elected members of the council.
- It is important in terms of putting in place a sound plan that can be used by the community at large, organisations such as the LEP and by business to support further investment in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1297   Respondent: 15216321 / Douglas Ollington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Unbalanced allocation of development in one area of the Borough

Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1306   Respondent: 15220097 / Douglas Barr Trudy Amos  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. We object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing units being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages.

**The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.**

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
The policy has reduced the amount of housing for which the plan provides from 13,860 units to “at least” 12,426 (equivalent to 654 dwellings per year). However, it is noted that this coincides with:

- An addition of a year to the plan period;
- An increase in the previous estimates of population growth, equating to an additional 229 people per year;
- An Annual Housing Target in the policy document which provides for only 9,810 units over the plan period;
- The SHMA (2014) indicated that the housing need could be up to 816 units per year. The March 2017 addendum has a lower figure. No real evidence is provided to justify this; and
- The publication of an addendum to the LAA in June 2017 which stated the housing requirement for the period 2017-2022 to be 4,681. This is using the OAN of 654, and includes a deficit of 631 with a buffer of 20%. It is an effective requirement of 936 dwellings per annum.

Taken as a whole, these points indicate that housing need is likely to be higher than 12,426, possibly considerably so. As such, we support the presentation of the figure as a minimum target. However, given the apparent tension with the identified supply, the Local Authority should be taking a positive approach to residential development, and supporting the principle of development within settlement boundaries, including villages in the Green Belt such as Gomshall.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/5095  **Respondent:** 15227329 / Sharon Pask  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp171/2212  **Respondent:** 15227329 / Sharon Pask  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

The Submission Plan contains several significant errors and there appears to be a lack of transparency in terms of the evidence base, the methodology and the subsequent assumptions that have been made. This is particularly so in relation to the ‘amended quantities of the new requirements for homes’ – the housing need figures – which in my view are open to legal challenge. By way of example, Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is just one of several glaring examples of why the plan is unsound. The inclusion of a 10% buffer in the housing number over...
the plan period which is entirely unnecessary. I object to the fact that in terms of the housing number, the Council has not (as it is required to do) used any constraints such as Green Belt, infrastructure, air quality, AONB and TBHSPA.

The plan represents a steady erosion of the Green Belt and no attempt appears to have been made to address the strategic significance of the Green Belt and its fundamental aim of preventing the sprawl of London. Specifically, I object to the change in the Green Belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. I also object to the removal of 3.1 hectares from the Green Belt without any justification, to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

In short, the proposed Submission Local Plan is unreliable, unbalanced and therefore unsafe. The Council has failed to remove this site from the Local Plan despite receiving thousands of objections from residents and from statutory consultees. The Council must know that site cannot contribute to the five-year housing projection due to several constraints, perhaps most notably the provision of sewerage capacity.

For the reasons listed above, I consider the plan is unsound and clearly not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1405</th>
<th>Respondent:</th>
<th>15229313 / Caitlin Gordon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1434</th>
<th>Respondent:</th>
<th>15231489 / Alan Road</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1436</th>
<th>Respondent:</th>
<th>15232193 / Elaine Brightman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>
- I OBJECT TO the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1463</th>
<th>Respondent: 15233633 / Hilary Head</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I would like my comments to be seen by the Inspector.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This plan has not been thought through, with potential major impacts on the villages of Send and Ripley. The traffic is already bad especially at peak times and also affected badly when A3 is blocked round Guildford.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I) I object to the 2016 draft local plan.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/1465</th>
<th>Respondent: 15233633 / Hilary Head</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>5) I object to the number of homes that the plan intends to deliver.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18616</th>
<th>Respondent: 15233633 / Hilary Head</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
5) I object to the number of homes that the plan intends to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1482  Respondent: 15234017 / Martin Head  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1496  Respondent: 15234529 / Oliver Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1567  Respondent: 15234849 / Alastair Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the allocation of sites in unsustainable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10376</th>
<th>Respondent:</th>
<th>15238049 / Glenda Charlick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the disproportionate amount of development in one area of the borough</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1595</th>
<th>Respondent:</th>
<th>15239297 / T Fleming</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>28. I object to the allocation of sites in unsustainable locations.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1579</th>
<th>Respondent:</th>
<th>15239425 / Debbie Preece</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to the disproportionate amount of development in one area of the Borough.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1619</th>
<th>Respondent:</th>
<th>15240161 / R O Moore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
7. The Borough Wide Strategy (Policy S2)

The Plan is unbalanced across the borough; there is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will lead to a loss of village identities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1632  Respondent: 15240673 / Chris Cook  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Policy S2 proposes a ridiculous volume of new higher density homes (385) which will completely change the character of the village to its' detriment. A very small volume of affordable homes should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6345  Respondent: 15241185 / Jill Gooding  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected. D3

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10712  Respondent: 15241185 / Jill Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to a disproportionate amount of development in a single area

Please register my VERY strong objections to these things.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1666  Respondent: 15241921 / Donald Jolliffe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

I OBJECT to Send village being removed from the Green Belt. On section 9, paragraph 79, of the Planning Practice Guidance. communities.gov.uk, “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their PERMANENCE.” Who gave you the right to change something that has and should be PERMANANT?
You should reconsider this move as it will alienate Guildford Council from its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/903  Respondent: 15244065 / G Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Recent and compelling evidence has shown that Guildford has greatly over-estimated its population growth. Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our already constrained borough.

Allocating too much land for development in the 2017 Plan will result in Guildford being required to provide homes for Woking on our Green Belt, which is irrational and reckless given the severity of congestion in Guildford, a gap town set in the Surrey Hills AONB. We do not need to sacrifice so much Green Belt nor increase town cramming simply to provide for Woking's unmet housing needs. We will be sacrificing our Green Belt to protect Woking's, and I strongly oppose this.

We need our Plan to be based on real figures, not one with inadequate infrastructure and destruction of Guildford's precious green character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2229  Respondent: 15244097 / Persimmon Homes (Craig Hatton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The proposed reduction in the housing requirement is unsound as this reduction is not justified.

It is extremely disappointing that the Council have reduced their housing requirement from the 2016 iteration of the Plan to the 2017 version. Guildford's OAN has previously been identified as 693 dpa upon which the 2016 housing requirement was set, with Guildford seeking to meet its housing needs in full. This was an extremely positive step in an area where housing needs have increased significantly and where pressure for new housing is extreme. The 2017 version has lost some 1400 dwellings from the 2016 iteration, which equates to a reduction of 75 dpa over the plan period. This is a significant reduction and one which is not justified. The most up-to-date population projections produced by the Office for National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 people. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity and access to London and reputation as being part of the commuter belt and a desirable place to live. The OAN as calculated in the new draft Local Plan is therefore inaccurate and should be revised upwards.
The 2017 addendum to the SHMA indicates that due to changing circumstances the Borough's housing need should be reduced from 693 dpa to 654 dpa. The argument for this appears to be based on economic and migration factors. The SHMA addendum uses the 2014 household projections as the most up-to-date figures available at the time of the compiling of the evidence. These projections show a percentage increase of 1.2% from the 2012 projections used previously. The migration argument is based on both internal and international migration. The SHMA identifies that there is likely to be a reduction in EU migration following the vote for the UK to leave the EU. However, as the SHMA states in paragraph 3.73 Guildford 'sees a lower proportion of EU in-migrants than was the case at a regional/ national level'. Therefore, any reduction in EU migration is likely to have little impact on Guildford. Even if EU migration is reduced, any future trading relationships established with other countries is likely to see a requirement to allow movement of people. This therefore means that there is a likely expected increase in international migration and the impacts of this do not appear to have been sufficiently assessed.

Internal migration focuses primarily on out-migration from London. At the most recent assessment, London has a substantive unmet housing need and a number of Local Authorities in London are developing Local Plans which do not appear to make concerted efforts to deal with this unmet need. The SHMA addendum identifies that migration flows from London to Guildford have been steady since 2008/9 and there has been no increase in net flows since the end of the recessionary period which is noted as being 2012. We are concerned that paragraph 3.45 seems to dismiss any potential increase in migration from London. Whilst there still remains some uncertainty regarding migration flows over the next 10 years evidence from the GLA shows that migration patterns will move towards the levels since pre-2008. The recovery in the economy and the availability of credit has seen an increase in home ownership and mortgage applications since 2012. Therefore it can be widely assumed that an increasing number of people are seeking to purchase homes where possible. London's affordability has decreased substantially and this will have an impact on those areas around Greater London which have access into the Capital for work and leisure purposes. Guildford, with a mainline train station and proximity to the A3 and M25 is historically an area where many people re-locate to from the Greater London area. In all likelihood, it is difficult to see how over the next 10 years there will not be an increase in migration from London to areas such as Guildford. That no provision appears to be made for this and paragraph 3.46 argues that there are no signals for a return to increasing levels of migration should be given limited weight as this is based on a single year of evidence.

There is an increasing need for housing in the Borough and this is coupled with an increasing requirement for affordable housing. The 2017 addendum shows that the need for affordable housing has increased to 517 dpa from the 2015 SHMA figure of 478 dpa and this is supported by paragraph 5.32 which states that 'it is clear that house price growth has accelerated in the Borough since mid-2013'. This affordability issue has been substantially affected by the low levels of housing growth in Guildford. In seven of the past eight years, Guildford has significantly underdelivered against its housing requirements. For the past seven years in a row the Council have delivered barely half of its annual housing requirement and this significant underperformance has enhanced levels of unaffordability in the Borough and is a strong justification as to why the Council should not be looking to further reduce its housing requirement. Paragraph 5.49 states that 'the analysis indicates that 629 dpa would be required to support the rebased SNPP ...... to support economic growth, a marginally higher level of housing provision at 631 dpa would be required'.

The 2017 addendum shows an increase in household projections, an increasing need for affordable homes and no consideration of the impacts of likely increased migration from London, suggests that insufficient uplifts have been included to account for these increases. The decreasing affordability is exacerbated by the Council's persistent under-delivery against its housing requirement and therefore there is no justification as to why the requirement should be reduced in this Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2230</th>
<th>Respondent: 15244097 / Persimmon Homes (Craig Hatton)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( No ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Guildford Local Plan is unsound as the identified housing delivery strategy is ineffective

Persimmon Homes believe that the proposed housing trajectory and the process of delivery is flawed and will result in significant under-delivery of expected units. The removal of the Housing Trajectory within Policy 52 is concerning and this now places a greater emphasis on the delivery towards the end of the plan period. This approach places a significant risk that the Plan may fail to meet its housing requirement particularly when there is an over-reliance on large sites being delivered for this period. This will leave the Council in a difficult position as there will be little time afforded to make up any shortfalls in delivery. This approach appears to be a way of the Council delaying development until as late in the plan period as possible and there can be no element of positive planning about this. The Council must consider smaller sites which are capable of delivering a sufficient quantum of development to run alongside the larger strategic sites. The Housing White Paper (HWP) has referred to the importance of including smaller sites to ensure a consistent supply is maintained.

The issue of deliverability is exacerbated by the Council's inability to demonstrate a five year housing land supply. The Council are unable to show this for the first 5 years of the plan period when it is in operation. There are severe concerns over the delivery of some of the larger sites upon which the Council are relying. The Plan proposes that smaller sites will deliver in the first five years with the larger strategic sites delivering in the 6-10 and 11-15 year periods. This back loading of the majority of development is concerning particularly when there are deliverability issues with some of the strategic sites such as Wisley Airfield. A planning application was refused for this site and an appeal to be heard later in the year. Neighbouring authorities Mole Valley and Elmbridge objected to this proposal and Highways England have previously raised concerns over the impact that this development will have on the A3 and M25 at junction 10.

Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements". It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.1 years supply. Guildford therefore need to make more land available for development as without this Guildford cannot expect to be able to show a five year supply. Guildford have removed sites from this draft of the Local Plan which are in the Green Belt and considered to be sensitive. Guildford should be looking to allocate smaller sites, which are able to contribute to providing for housing delivery in order to ensure a rolling five year land supply. The NPPF at paragraph 83 states that "Green belt boundaries should only be altered in exceptional circumstances" however we would advise that the inability to show a five year land supply should be considered to be exceptional circumstances.

In terms of an approach to assessing the five year supply it appears that the Council are favouring the Liverpool method which will see the backlog delivered over the life of the plan period. This does not accord with national policy which suggests that the Sedgefield method should be used which aims to deliver the backlog as quickly as possible and ensures that development is not delayed. In addition to this the Council propose to use 20% buffer which we would agree with given the past delivery problems. We believe that the Local Plan is unsound as the current proposed housing trajectory is ineffective and will not provide the full housing requirement over the plan period. There is too greater a reliance on large sites and the Council should be looking to bring forward smaller sites earlier in the Plan period in order to be able to demonstrate a five year land supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1729  Respondent: 15244641 / Wesley Raynbird-Tilbury  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY S2 - Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

"1 NPPF paragraph

"2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

"3 Including: "empowering local people to shape their surroundings ... Take account of the different roles and character of different areas... protecting the Green Belts around them ... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future ... Contribute to conserving and enhancing the natural environment and reducing pollution ... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets ... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable ."

"4 At the time of writing , about £8billion (40%) has been wiped off the value of the UK's top 4 housebuilders alone .
1. The status of the 13,860 figure is The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is irrational to embark on a radical transformation of the borough without a clear Housing Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1795  **Respondent:** 15246497 / G F Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the amount of development, in one area of the Borough, you so called planners, obviously do not live in these areas. Perhaps it would all be different if you did?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/1796  **Respondent:** 15247265 / Aileen Aitcheson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Comments on Proposed Submission Local Plan**

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

*I therefore OBJECT to the Proposed Submission Local Plan.*

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

**Policy S2: Borough Wide Strategy**
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

I find this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not as long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by me, which unequivocally rejects GBC’s Forced Growth policy.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comments on Proposed Submission Local Plan

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst I note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

I find this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing
policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not as long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by me, which unequivocally rejects GBC’s Forced Growth policy.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1844 Respondent: 15248321 / Gordon Pipe Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/1864 Respondent: 15248481 / Jamie McCallister Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

7. I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
(February 2016) confirms that in the past the majority of housing supply in the borough has been delivered on small windfall sites.

Paragraph 47 of the NPPF confirms that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%.

We support the Council's inclusion of small sites within the proposed delivery strategy and consider that the land at Weybrook, Gomshall could provide a small-scale residential development to contribute to the Council's housing supply within the next 5 years. Although, the Local Plan proposes several large housing allocations it is considered that small windfall sites will continue to have a role in the borough's housing supply, particularly in the early part of the plan period as the large strategic sites will have longer lead-in times before housing can be delivered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1923  **Respondent:** 15254113 / R Orchard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1921  **Respondent:** 15254305 / Ben Barnwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1924 Respondent: 15254305 / Ben Barnwell Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13703 Respondent: 15254337 / Ben Warwick Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
**Comment ID:** PSLPP16/1965  **Respondent:** 15255553 / J.A. Vickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. I OBJECT to the Borough Wide Strategy (Policy S2)</td>
</tr>
<tr>
<td>1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
</tr>
<tr>
<td>2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
</tr>
<tr>
<td>3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
</tr>
</tbody>
</table>

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Background

1.1 These representations have been prepared in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2016. This report takes into account earlier representations, as relevant, made to the Council in response to consultation on the emerging Local Plan and its supporting evidence base.

Progressing the plan

1.2 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth, which is supported.

Meeting Objectively Assessed Housing Need

1.3 The spatial vision set out in the Proposed Submission Local Plan: Strategy and Sites identifies that the plan makes provision for the delivery of 13,860 additional homes by 2033. This represents the Council meeting its Objectively Assessed Need (OAN) per annum of 693 homes across the plan period 2013 – 2033.

1.4 In order to accommodate the full objectively assessed needs within the Borough, it is acknowledged by Guildford Borough Council that this is dependent on Green Belt releases. The proposed Green Belt releases have been informed by the Green Belt and Countryside Study (GBCS), which has been subject to further work since the last round of consultation on the Local Plan in July 2014.

1.5 Guildford’s commitment to achieving their full objectively assessed housing need is welcomed and supported.

Housing Trajectory

1.6 The Housing Trajectory demonstrates that there is a cumulative housing deficit up until 2027/2028 given the reliance on the delivery of complex/difficult strategic sites. This deficit reaches a peak in 2017/2018 (i.e. the year before the planned adoption of the plan) at an housing under provision of 2,019 dwellings based on the potential housing provision figures between 2013-2018.

1.7 In order to ensure the soundness of the plan there is a need to fill a gap in the early years of the plan period with a greater number of smaller sites where there is certainty that they can and will be delivered in the first five years of the plan period. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.

1.8 It has been demonstrated that our client’s site could deliver around 70 dwellings of both market and affordable housing within the first five years of the plan period which will contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period to ensure the soundness of the plan.
1.9 Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
160718 Guildford Local Plan Representations July 2016 - 1.pdf (16.7 MB)  
160718 Guildford Local Plan Representations July 2016 - 2.pdf (15.8 MB)

Comment ID: PSLPP16/17659  
Respondent: 15256225 / Boyer (Michelle Thomson)  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Detailed policy matters

1.41 Several concerns regarding individual policies are highlighted, including the size of sites where affordable housing is sought, lack of account taken of started homes and onerous requirements regarding design policies.

1.42 The application of the approach in our Green Belt Assessment and evidence presented in our previously developed land report demonstrates that inter alia on the basis the site would provide for around 70 dwellings that the site in Send Marsh should therefore be allocated for residential development. This approach would ensure the soundness of the plan and in particular policies S2: Borough Wide Strategy, P2: Green Belt and D4: Development in urban areas and inset villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Progressing the Plan

5.1 Guildford appears to have embraced national Government Advice, made clear within the Housing and Planning Act, to ensure that Local Plans are put into place as quickly as possible in order to facilitate much needed strategically planned growth. In this regard, Guildford’s commitment to progressing their Local Plan in line with Government Advice and the Housing and Planning Act is supported.

5.2 This commitment to progressing their Local Plan is demonstrated by the fact that Guildford has now progressed to a Regulation 19 consultation, which is also welcomed.

Approach to Objectively Assessed Need
5.3 Since the consultation of the Draft Guildford Borough Local Plan: Strategy and Sites in July 2014, as above, the West Surrey Strategic Housing Market Assessment (SHMA) was published in September 2015. The SHMA was produced jointly with Waverley and Woking as with Guildford, the three boroughs are considered to constitute an Housing Market Area.

5.4 The SHMA sets out that the objectively assessed housing need (OAN) for Guildford is 693 dwellings per annum.

5.5 Our clients have carried out an independent assessment of the objectively assessed need (see Appendix Six) which supports a case for a higher OAN. An OAN of 693 should therefore be treated as a minimum.

5.6 Guildford Borough Council has been clear that, ‘appropriate sustainable sites can be allocated within the plan to meet the OAN for both housing and employment’ (Executive Summary of the Full Council report dated 24 May 2016).

5.7 The plan period is now proposed as 2013 – 2033 and taking the OAN of 693 as set out in the SHMA, this equates to the provision of 13,860 dwellings in the plan period. Policy S2: Borough Wide Strategy confirms this position in the policy, setting out that, ‘During the plan period (2013 – 2033), we will make provision for 13,860 new homes…’

5.8 Of note is the fact that the Draft Guildford Borough Local Plan: Strategy and Sites published in July 2014 had a plan period of 2011 – 2031 and made provision for 13,040 new homes, which equated to an annual requirement of 652 new homes a year.

5.9 The final SHMA published in September 2015 states that it incorporates the 2012 CLG Household projections and other factors such as student growth.

5.10 Guildford’s commitment to achieving their full objectively assessed housing need is welcomed and supported.

Spatial Development Strategy

5.11 Paragraph 4.1.6 of the supporting text to Policy S2: Planning for the borough – our spatial development strategy sets out that:

‘Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). These locations are:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt villages

5.12 Paragraph 4.1.8 goes onto set out that, ‘Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. These include:

- Countryside beyond the Green Belt
- Urban extensions to Guildford and Ash and Tongham
- New settlement at the former Wisley airfield
- Development around villages (including some expansion).

5.13 It is assumed that villages such as Send Marsh and any associated boundary adjustments to the Green Belt in this area will then be considered under the ‘Inset villages’ part of Policy S2 and this approach is supported.

5.14 Furthermore the proposed settlement hierarchy for the Borough’s settlements is also supported as set out in the ‘Guildford Borough Settlement hierarchy’ which forms part of the evidence base for the Proposed Submission Local Plan: Strategy and Sites June 2016.

5.15 As set out in section 4.0 of the document entitled, ‘Guildford Borough Settlement Hierarchy’, (which refers to the ‘updated settlement hierarchy’), the sustainability ranking of the settlements designates Send Marsh/Burntcommon as a
large village. Large villages are defined in the settlement hierarchy as being “unsuitable for substantial growth but capable of accommodating a proportionate extension.”

5.16 The justification for deviation from the sustainability scoring is supported, as is the rationalisation that the population size and proximity of the village to the services in East Horsley and Send result in Send Marsh/Burntcommon sitting more ‘comfortably’ with the other large villages within this category.

5.17 It is considered that the classification of Send Marsh is suitable and accurately reflects the characteristics and role/function of both the village and its interrelationship with the surrounding area.

5.18 The conclusions state that “it would be appropriate to direct new development towards…Send Marsh/ Burntcommon” and other locations within the Borough which are considered to be “the most sustainable in terms of their level of community services and facilities, access to higher order centres and employment opportunities, and ability to support new development.”

5.19 This approach and the conclusions in relation to Send Marsh within the ‘Guildford Borough Settlement hierarchy’ are supported.

Strategy to Meet Objectively Assessed Need

5.20 The spatial vision set out in the Proposed Submission Local Plan: Strategy and Sites identifies that the plan makes provision for the delivery of 13,860 additional homes by 2033. This represents the Council meeting its Objectively Assessed Need (OAN) per annum of 693 homes across the plan period 2013 – 2033.

5.21 In order to accommodate the full objectively assessed needs within the Borough, it is acknowledged by Guildford Borough Council that this is dependent on Green Belt releases. The proposed Green Belt releases have been informed by the Green Belt and Countryside Study (GBCS), which has been subject to further work since the last round of consultation on the Local Plan in July 2014.

5.22 This broad approach, which follows the spatial strategy as outlined above to enable the OAN to be met, is supported.

Housing trajectory

5.23 Notwithstanding the above support to the overall approach, there is concern over the deliverability of the housing. The Housing Trajectory identifies the potential housing provision over the plan period (2013 – 2033). This potential provision is broken down into the following five year periods: 1) Pre-adoption (2013 – 2018), 2) the first five years (2018 – 2023), 3) 6 – 10 years (2023 – 2028) and 4) 11-15 years (2028 – 2033).

5.24 What is clear from the Housing Trajectory is that there is a cumulative housing deficit up until 2027/2028 given the reliance on the delivery of complex/difficult strategic sites. This deficit reaches a peak in 2017/2018 (i.e. the year before the planned adoption of the plan) at an housing under provision of 2,019 dwellings based on the potential housing provision figures between 2013-2018.

5.25 This is a significant deficit and with a housing target of 693 dwellings per annum, equates to a deficit of almost 3 years housing provision at the point of adoption of the plan. Such a heavy reliance on strategic sites coming forward at the end of the plan period therefore makes the plan vulnerable.

5.26 The Plan should demonstrate a 5 year housing land supply at the point of adoption. Guildford Council’s proposed position will be that they will not be able to do so and consequently the plan is unlikely to be found sound on this basis without modification.

5.27 In order to ensure the soundness of the plan there is a need to fill a gap in the early years of the plan period with sites where there is certainty that they can and will be delivered. This will ensure diversity of supply and ensure the plan accords with the requirements of paragraph 47 of the NPPF.
5.28 It has been demonstrated that our client’s site could deliver around 70 dwellings of both market and affordable housing within the first five years of the plan period which will contribute to meeting the extensive needs which exist within this area as well as within the Borough as a whole at the start of the plan period.

5.29 Furthermore, paragraph 47 highlights that, ‘Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land’.

5.30 Therefore, given Guildford Council’s persistent and significant under delivery of housing, in order to accord with the NPPF, not only should the plan demonstrate a 5 year housing land supply at the point of adoption, but it should also demonstrate a buffer of 20% in addition to this.

5.31 This further emphasises the critical need for the Plan to demonstrate that there is a supply of sites with certainty that can and will be delivered at the start of the plan period, such as our client’s site at Polesden Lane and Send Marsh Road, Send Marsh.

Reliance on strategic sites

5.32 The reliance of the Local Plan on strategic sites to deliver the required housing during the plan period makes the plan vulnerable particularly given that just six sites are being relied upon to deliver 66% of the overall OAN requirement.

5.33 Each of the six strategic sites are all allocated to deliver in excess of 1,000 new dwellings and will therefore inevitably have considerable lead in times prior to their delivery. This is demonstrated in the LAA housing trajectory with five of these sites not expected to deliver any housing before 2021/2022.

5.34 The Sustainability Appraisal highlights this issue and notes that the Council’s preferred approach results in “an increased reliance on larger sites and hence there would be a likelihood of undersupply within the early part of the plan period.”

5.35 In addition the SA acknowledges that the “high reliance on large (‘strategic’) sites results in a risk that one or more sites will deliver slower than anticipated (or, indeed, not deliver at all in the plan period)”.

5.36 This is compounded by the fact that a number of the larger sites allocated within the Local Plan are also reliant on the delivery of significant infrastructure which in turn may also result in additional delays or a lack of housing delivery.

5.37 This is highlighted in the Duty to Cooperate Topic Paper which states in paragraph 4.45 that ‘…the delivery of former Wisley airfield, Gosden Hill and Blackwell Farm is dependent upon the delivery and timing of key infrastructure requirements on the A3. This is reflected in the expected phasing of the sites, with the majority of provision anticipated post 2027.’

5.38 The current housing trajectory therefore places heavy reliance on the delivery of large strategic sites late within the plan period. This strategy increases the risk that the necessary housing delivery rates will not be met during the plan period leaving the Council unable to demonstrate a five year housing land supply.

5.39 As seen in other Local Authorities, including Wokingham Borough Council, where a similar approach has been taken inevitably lead in times for strategic sites and substantial infrastructure projects are greater than anticipated and delivery is often subject to unforeseen delays.

5.40 The proposed strategy results in three of the strategic sites (Wisley Airfield, Gosden Hill and Blackwell Farm) all having annual housing delivery rates of between 230 – 290 new homes per annum, between 2028 – 2033, which as set out above are all sites which are dependent upon the delivery of critical infrastructure.

5.41 It is also worth noting that the annual housing delivery levels for both Wisley Airfield and Gosden Hill are both greater than the entire annual delivery rates of housing within the Borough in 2013/2014 and 2014/2015 respectively.
5.42 In order for the Local Plan to be found sound at examination this issue must be clarified in order to ensure that the housing delivery proposed across the Borough within the plan period is clearly demonstrated through the supply of sites with certainty that they can and will be delivered, such as our client’s site at Polesden Lane and Send Marsh Road, Send Marsh.

Query over conflicting information

5.43 As set out in the Duty to Cooperate Topic Paper which forms part of the evidence base for the emerging Local Plan “…the total provision of new homes across the plan period (including completions since 2013 and outstanding capacity) within the Proposed Submission Local Plan is 15,844. This provides 1,984 homes as a buffer.”

5.44 It is however noted that Table 1 which accompanies Policy S2: Borough Wide Strategy and sets out the planned delivery of housing between 2018 – 2033 only demonstrates 13,652 homes being delivered between 2018 and 2033.

5.45 This is contrary to the supporting text in paragraph 4.1.12 which states that the table “shows a number of new homes that is greater than the figure in the policy” and does not accord with the housing trajectory set out in the LAA.

5.46 The Council has not justified this approach and without such justification it has not been demonstrated that the plan is consistent with national policy and therefore it has not been demonstrated that the plan is sound.

5.47 We therefore reserve the right to submit further information in regards to the housing strategy of the Borough on the basis that the Council has been unable to provide any clarification in respect of these issues during the six week consultation period.

Soundness of the plan

5.48 In order to ensure that the Local Plan is found sound at Examination we would therefore strongly recommend that the Council revises its housing trajectory to incorporate a greater number of smaller sites which can deliver in the earlier stages of the plan period thereby ensuring that the housing trajectory is robust and achievable.

5.49 This would accord with paragraph 035 of the National Planning Practice Guidance (NPPG) which states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period”.

5.50 As set out in this report Land at Polesden Lane and Send Marsh Road, Send Marsh is a largely unconstrained site in a sustainable location which is available immediately for development.

5.51 We have demonstrated through our Green Belt Assessment and this report that the existing Green Belt designation associated with this land should be removed and as such there are no overriding constraints to prevent early delivery of the site at Polesden Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the
   borough and does not apply any constraints to reduce the overall housing figure, which would be very
   reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration.
   These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough
   area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live,
   work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford
   borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour
   commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East
   and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of
   Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-
   borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
   Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex
   housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public
consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative,
however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived
from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build
homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across
the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of
the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden
Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing
being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards
represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of
housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A part of any local plan should be to use up all brownfield sites first, whether immediately available or at a later date, before any other land for housing is considered. There are areas in the Guildford area where there are unoccupied pieces of land, derelict offices and industrial areas. Areas which need re-generation must be identified and used for housing needs before any other land is considered. Developers must be made to use brownfield land and not just proceed with what they see as a 'cheaper' option, i.e. the development of green fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10477  Respondent: 15257281 / Kath Frackiewicz  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The recent proposal for new housing at the Effingham School site was recently rejected by GBC. Surely if this site was rejected then the conditions for building more homes in the Horsleys & Ockham are even less justifiable.
2. Onslow Estate Housing - Why has this proposed area not been listed for new housing? I understand from the local press that GBC do not wish to take up the offer for this large site to have new houses. This site has good access to the A246 and is close to Merrow shops and public transport including the park & ride which provides excellent access to the centre of Guildford.
3. In order to achieve a better balance in the housing stock GBC should implement a strict policy to ensure that the demolition of small houses including bungalows and the resulting construction of replacement houses of a much larger size be immediately stopped. Whilst current policy appears to favour the developer, the removal of smaller housing stock reduces the number of properties to which people can downsize to and obviously if there are no such smaller houses available in the area that people wish to continue to live in they will just remain in their larger homes and not free up existing houses for growing families.
4. It would appear that many of the comments and views raised by local people in the previous consultation appear to have been largely ignored, certainly as far as the Horsleys, Ockham & Ripley villages are concerned.
5. The objective of adding some 14,000 new homes, which I understand represents a net increase of some 25% to the housing stock of Guildford Borough over the next 20 years, appears grossly overstated given the nationally projected population increase of 15% over the same period. I have to question whether employment in the area; infrastructure including roads and public transport; facilities such as hospital, medical and schooling; will increase by a similar amount. If not then it surely is illogical to start to plan for so many additional houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1627  Respondent: 15257281 / Kath Frackiewicz  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Borough Wide Strategy: I object to the statement where it states "the figures set out in the Annual Housing Target table sum to a total of 12,426" yet the numbers in the table only add up to 9,810. What is the significance of the missing 2,616? I also object to the inclusion of a 10% contingency in the housing number over the plan period. This is unnecessary and misleading in putting forward housing requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9789  Respondent: 15262305 / L J Crane  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick's Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2058  Respondent: 15263073 / James Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.1 OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2257  Respondent: 15263425 / Rosemary Napp  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I oppose the development of the Blackwell Farm site, there cannot be a good solution to the problem of additional pressure on traffic using this part of the road network.

The housing proposals in Guildford Town Centre must only be approved if there is a limit to height of building, no more than 4 stories, that there is no interference with the unique views that give Guildford Town its character. High quality materials should be specified that blend with the natural environment. There should be no increase in the number of houses allocated for the Town Centre, whatever is decided for other sites. Green spaces in the Town need to be preserved.

It should be accepted that provision of the level of housing required will mean some incursion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2077  Respondent: 15263905 / Philip Walker  Agent:
2. OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Brownfield sites centrally should be developed to produce more accommodation for students on campus and homes for the elderly thus freeing up family homes in the surrounding areas that could come back onto the market to ease the housing shortage.

I strongly believe this expansion plan is wholly inappropriate to the structure, size and layout of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2091</th>
<th>Respondent:</th>
<th>15264001 / Robert Peake</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

2.1 **OBJECT** to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/7475  **Respondent:** 15264065 / Roshan Bailey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the numbers set out in this policy. There appear to be serious flaws in the methodology used in the SHMA and the conclusions derived from it are consequently unacceptable. Particular issues of concern are that inconsistent jobs and employment data have been used for the economic assessment of housing need; there is no assessment of the likely impact of Brexit; and the economically derived housing number is taken as the OAN without consideration of the potential for sustainable commuting or the implications of the Green Belt land area within the borough. There is also significant circularity in the arguments. For instance, a significant proportion of the projected economic growth arises from the construction work to build dwellings for the workers needed in economic growth. So you only need the workers if and while you build the houses. This is not sustainable economic growth and cannot justify building the houses. Similarly, schools are said to be needed to serve the new homes. The answer to this circularity is not to build the houses.

I also object to the approach by which huge developments are proposed for just a few sites in extremely sensitive areas. A more organic approach with more but smaller developments spread across the borough to meet only the real needs of our communities would be much fairer and more sustainable. There is a perversity in proposing to destroy the character of our villages and thus reducing their attraction. If the Economic Strategy is not realistically achievable without destroying the character of our borough and its villages, then that strategy should be reviewed. Economic growth at all costs is not a desirable objective.

Given my recognition of the need for some development and for all of us to share the burden, I am not commenting in detail on all the sites in my neighbourhood, only on A26 and A46 (see below). However, I would make the general comment that there must be no “thin end of the wedge”, no continuing encroachment once a small site has been approved, and there should be consistency in application of the policies.

I also object to the lack of any policy reference to retrospective applications. I suggest that specific words should be included in the policies, probably this one, to make it clear that developing first and asking later will not be tolerated. Indeed, there should be a presumption that retrospective permission will not be granted and that enforcement action will be taken except where there is a really exceptional and acceptable explanation for the failure to seek approval first.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/2125  **Respondent:** 15264225 / Mel McVickers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
6) I object to the Borough wide strategy, as most of the proposed development is concentrated around the villages of Ripley, Send, Clandon and Wisley. There has been no acceptable reason why all of these villages in a concentrated area should be ruined when there are more suitable sites within the Borough. If the Gosden Hill site is developed that in itself will impact hugely on the villages. Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2130  Respondent: 15264449 / Elaine McVickers  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) I object to the Borough wide strategy, as most of the proposed development is concentrated around the villages of Ripley, Send, Clandon and Wisley. There has been no acceptable reason why all of these villages in a concentrated area should be ruined when there are more suitable sites within the Borough. If the Gosden Hill site is developed that in itself will impact hugely on the villages. Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14925  Respondent: 15265377 / Emma Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2132  Respondent: 15265793 / Sam Rowley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
7 I OBJECT TO THE DISPROPORTINATE AMOUNT OF DEVELOPMENT IN ONE AREA

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2138  Respondent: 15265889 / Christine Croston  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

06 I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1078  Respondent: 15266273 / Danescroft Land Ltd Danescroft Send LLP  Agent: Pegasus Group (Mike Spurgeon)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Table 1/Table 2

5.4 Following extensive revisions to Table 1 and Table 2, Send is not explicitly recognised in the settlement hierarchy while its role as one of six rural Local Centres is no longer referred to. As such, the sustainability and potential of Send has not been fully considered or accurately reflected.

Please see attached for context of representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Local Plan Policies
1.19 As a result of the new and updated evidence base set out above there have been a number of alterations made to the emerging policies set out within the Local Plan.

1.20 A full summary of all of the amendments are set out in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ document prepared by the Council.

1.21 However, generally these can be categorised as follows:
- Additional wording to reflect the NPPF, NPPG, or recent legislation;
- Additional or revised wording to provide clarification or further explanation of a policy’s intent;
- Additional or revised wording to reflect the consultation responses of statutory consultees (e.g. Environment Agency, Historic England, Natural England);
- Amendment to reflect an alteration proposed to a site allocation, Green Belt boundary or settlement boundary;
- Amendment to reflect or make reference to new or updated evidence;
- Deletion of text considered superfluous or unnecessary;
Representations in response to the Guildford Borough Proposed Submission Local Plan | Land at Polesden Lane and Send Marsh Road
- Correction of typographical errors.

1.22 Of the amendments made to the Local Plan the most significant are the alteration to the proposed plan period which is now 2015.

1.23 The 2017 version of the Local Plan now seeks to deliver only 12,426 additional homes rather than 13,860 homes as proposed in the 2016 version of the Local Plan (a reduction of 1,434 homes).

1.24 This is reflected in draft Policy S2 which has now also been revised to illustrate a revised annual housing target. A summary of the proposed amendments to the annual housing target are set out in the table below.

1.25 It should be noted that as a result of the proposed plan period between the 2016 and 2017 versions of the Local Plan being revised there is no annual housing target for 2033/34 in the 2016 version or 2018/19 in the 2017 version.

1.26 This is because the plan period ended in 2033 in the 2016 version and the 2017 version of the plan is not anticipated to be adopted until 2019. As such, Guildford Borough Council is taking the approach that, the annual housing target does not commence until 2019/2020 following the proposed adoption of the plan.

[Table]

1.27 The differences between the total amount of housing proposed to be delivered between the 2016 and 2017 versions of the plans are explained below.

1.28 It can be seen that in the first five years following the adoption of the Local Plan (2019 – 2024) 750 fewer homes are proposed to be delivered as part of the 2017 version of the Local Plan.

1.29 The annual housing target in emerging Policy S2 does not total the number of dwellings proposed to be delivered overall by the spatial vision in either the 2016 or 2017 version of the Local Plan.

1.30 This is owing to the fact that the annual housing target does not relate to the entire Plan period. In the 2017 version of the Local Plan for example the overall housing target is 12,426 however the annual housing target numbers only equal
9,810. This is as a result of the Plan period for the 2017 version of the Local Plan being 2015 – 2034 but the annual housing target only commencing in 2019/2020.

1.31 The 2,616 difference between the overall housing target of 12,426 and the total of the annual housing target (9,810) therefore relates to the pre-adoption period of 2015 – 2019. This is demonstrated in the Housing Trajectory set out in the 2017 LAA Addendum. A summary of this is provided in the table below.

[Table]

1.32 The new OAN figure of 654 as proposed in the SHMA Addendum and 2017 version of the Local Plan is therefore utilised across these four years as the annual target. This however results in a projected backlog of 974 houses prior to the adoption of the emerging Local Plan owing to poor housing delivery rates.

Site Allocations

1.33 The 2017 version of the emerging Local Plan makes a number of significant amendments to the site allocations previously set out in the 2016 version of the Local Plan. These amendments include the removal of six site allocations and the insertion of two new site allocations.

1.34 Specific details of the amendments made to each site allocation can be found in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ published by the Council.

1.35 However, several of the amendments relate to the capacity or proposed uses associated with site allocations identified in the 2016 version of the emerging Local Plan.

1.36 This includes an additional 550 homes being proposed at site allocation A29 (Land to the south and east of Ash and Tongham) and the removal of the industrial element from site allocation A43 (which has been re-located to new site allocation A58).

Policies Maps

1.37 As part of the Regulation 19 public consultation in 2016 approximately 40 policies maps were published to spatially illustrate the proposed planning policies and site allocations set out in the emerging Local Plan.

1.38 In light of the amendments made to the evidence base, strategic policies and site allocations in the 2017 version of the emerging Local Plan which have been set out above more than one third of the policies maps in Appendix H have been subject to amendment.

1.39 The extent of amendments proposed to each map varies considerably however, the alterations can be generally categorised as follows:

- Correction of an identified error in the previous policies maps;
- Removal or amendment to a site allocation or new designation of a site;
- Green Belt boundary amendments; or
- Amendments to a settlement boundary.

1.40 Specific details of the amendments made to each policy map can be found in the ‘Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)’ published by the Council.

1.41 With regards to the Green Belt boundary amendment at Land at Polesden Lane and Send Marsh Road the alteration proposed would in effect revert to the existing Green Belt boundary.

1.42 As such the revisions to the Green Belt boundary originally proposed under the Regulation 19 consultation held in 2016 are no longer intended to be incorporated.

1.43 Under the current proposals as set out in the policies maps which accompany the targeted Regulation 19 consultation Land at Polesden Lane and Send Marsh Road would therefore not be removed from the Green Belt.
4.4 As set out in Section 2 of this report one of the most significant influences on the 2017 version of the emerging Local Plan has been the addition of the ‘West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report 2017’ to the evidence base.

4.5 As a result of this Addendum Report the Objectively Assessed Need (OAN) for Guildford has been revised from 693 homes per year to 654 homes per year.

4.6 However, the Addendum Report demonstrates that there is a clear and increasing need for housing within the Borough. Indeed the demographic and affordability findings of the Addendum Report do not support the proposed reduction in OAN incorporated into the 2017 version of the emerging Local Plan.

4.7 We do not therefore support the lower OAN figure utilised in the 2017 Proposed Submission version of the Local Plan. This amendment to the Local Plan is therefore considered to be unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724 Representations.pdf (6.9 MB)

Policy S2 - Planning for the Borough - Our Spatial Development Strategy

The spatial strategy rests heavily on a small number of strategic sites to deliver the longer term housing supply over 6-10 and 11-15 years. However, if there is a delay in delivering these strategic sites, or they prove not to be viable, then the supply of housing will be significantly interrupted. Smaller sites should be identified near to the large strategic sites to improve delivery and avoid under-supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The strategy put forward is unsound due to over-reliance on “Land at former Wisley airfield, Ockham.” Please refer to letter dated 8th July 2016 for further detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2288  **Respondent:** 15270401 / Lynne and Nick Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Brownfield Sites are Available

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2252  **Respondent:** 15273217 / Peter Shaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

I object to the local plan (Proposed Submission Local Plan: strategy and sites 2017) in its current amended form, my submission should be taken into account as the proposing housing target has changed to 12,426 and my submission is a comment on this altered figure and the confidence the public have on this newly proposed figure. The proposed housing target is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA.

The 12,426 proposed housing target figure (with an annual rate of 654 new homes per year) is a significant uplift compared to the current 2003 local plan that is in effect now (which has an annual housing target figure of 322 new homes per year). As the proposed housing target figure is over double the 2003 current target figure, it is imperative the local plan justifies this uplift in significant and accurate detail, to give the local population confidence in the proposed plan.

However the proposed local plan and recent amendments fall short of this by a significant margin. Guildford Borough Council outsourced the formulation of the Strategic Housing Market Assessment (SHMA) to GL Hearn. GL Hearn produced a SHMA that detailed key findings and figures, however the exact manner of how these figures were formulated and calculated were not disclosed. When relevant FOI requests were made to Guildford Borough Council on how these figures were calculated, the council responded that these calculations could not be disclosed due to commercial sensitivities. As a member of the public I have had to take on face value that the figures produced in the SHMA are accurate and are robust. This is not transparent governance and this is not fair to the public, we are being asked to consult
on a local plan that we can not scrutinise in detail. The proposed housing target figure is a key bedrock to the rest of the local plan as it effects how much land in the borough needs to be set aside for development and not to be able to scrutinise this figure in detail means I have no confidence in this figure and the local plan as a whole.

As the exact nature on how the figures reported in the SHMAs are calculated and protected behind 'commercial sensitivity' clauses they are not able to be scrutinised by FOI requests. I recently asked Guildford borough council if they had fact checked or scrutinised the recent 2017 SHMA documents themselves. At first they misinterpreted my request and after a formal review of my FOI requested GBC responded (the first response is attached as a word document and the internal review response is added to the end of this submission as an appended email);

Extract from response;

"Planning Services have reviewed your comments of 26th June and respond as follows:

- Edge Analytics (demographic company) were commissioned to review both the Guildford SHMA and an earlier version of the West Surrey SHMA. This provided the Council with reassurance regarding the robustness of the methodology employed by GL Hearn in preparing subsequent iterations of the SHMA.
- The Council commissioned Edge Analytics to review the Guildford SHMA and Waverley Borough Council commissioned them to review an earlier version of the West Surrey SHMA. Both these reports were analysed by officers to validate the robustness of the findings and understand any concerns raised or recommendations for additional work.
- The Council does not possess a copy of the demographic model used to prepare the SHMA nor does the Council have an alternative model through which to run a comparative analysis of figures. The Council utilised a specialist company (Edge Analytics) to critically review the work. Both these reports by Edge Analytics were made available to you in the response on 26th June 2017."

Although not clear at first read through, the above (in parallel with the attached initial response from the council) is an admission by the council that GBC have not fact checked or scrutinised the figures in the recent local plan submission, provided to them by GL Hearn. Edge Analytics scrutinised the 2014 SHMA, not the 2015, 2016, 2017 SHMAs (or recent amendments)! After Edge analytics had reviewed the 2014 SHMA significant errors were still found within the 2014 SHMA data and it was publically believed to be not fit for purpose. How the council believes a flawed SHMA produced by GL Hearn can be robust in its methodology after a failed review process by Edge Analytics is beyond belief. If the 2014 SHMA was so wrong how on earth can the public have any confidence that GL Hearn can produce a reliable 2017 SHMA especially as it has not been reviewed by anyone within the council or contracted by the council!

This response from the council proves the Council has not conducted any recent reviews on the provided figures in the most recent proposed local plan with amended figures. Seeing as the calculations behind these figures are protected by 'commercial sensitivities' the public has to have confidence that the figures have been scrutinised to a reliable level, which in this case it has not. As the amended proposed housing target figure is such an important figure to the rest of the local plan this makes the whole proposed Local Plan unsound and as such the whole amended plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages which compromises the overall character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17050  Respondent: 15277185 / David Skinner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having read through much of the detail relating to this plan, I would like to object strongly to it. I fully support the Guildford Residents Association response. This plan is not ready for an inspector.

In particular, I am very concerned about the approach Guildford has taken compared to plans elsewhere in that it chooses not to constrain its overall housing growth. Why would we make this choice when others do choose to contain their growth plans?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/2330  Respondent: 15278337 / Alastair Rutherford-Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council –Draft Local Plan

We represent the views of 54 individual residents in The Ridings, East Horsley, KT24 5BN. a private road off Forest Road, who are unanimous in their objection to the proposed submission of the Local Plan, on the following grounds.

Borough-Wide Strategy, Policy S2

We do not have the expertise to analyse the figures in this part of the Plan, but we have read and understood the comments made by East Horsley Parish Council, and we strongly support its comments. In view of the doubts it casts on the veracity and reliability of your figures, the burden of proof in justifying the very significant building proposals is now plainly on the Borough Council.
We specifically reject the Borough’s Forced Growth Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17640  **Respondent:** 15278369 / Ripley Parish Council (Jim Morris)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Parish Council also objects to the overall strategy for new housing development, which:

(a) is based on an OAN with no allowance for the policy and landscape constraints of the District;

(b) appears to exceed the OAN for the District;

(c) would cause significant harm; not only from the development of countryside for housing but also by reason of its effect on minor rural highway network; and

(d) disproportionately directs new housing to villages and land in the Green Belt and rural areas.

This Report sets out the objections to that Strategy.

While Guildford Town Centre and urban area takes 2,742 units. This is less than 14% of the total projected housing requirement and much of the remaining 11,000 homes are to be accommodated in urban and village extensions (mainly open countryside around existing settlements) and in rural areas including what are called “inset villages” - effectively a redrawing of Green Belt boundaries to exclude former Green Belt villages and open land surrounding them from the protection of Green Belt designation. Of the 11,000 non-Town Centre requirement over 50% are being planned for the 3 North East Wards of Lovelace, Send and Clandons/Horsleys. This is disproportionate and unacceptable for such a small and sparsely populated area.

It is noted that there is a significant shift in the balance of urban to rural housing site allocation at the expense of the Green Belt, when comparing the housing allocations in 2016 in comparison to the 2014 draft Plan. In the 2014 Plan Guildford town centre and urban area was allocated 3439 homes. Total housing potential listed was 14057 but there was a provision of only 13,040 in 2014 policy 2, which means that nearly 25% was allocated originally for town/urban in 2014. However the parameters of site allocations seem to have altered which now masks the true extent of the shift from urban to rural. For example, A24 Slyfield (1000 homes), A25 Gosden Hill Farm (2000 homes) and A26 Blackwell Farm (1800 homes) are now designated as “Guildford urban area” whereas in 2014 these 3 sites were allocated as “land around Guildford urban area”. The 2016 PSLP town centre and urban area (excluding Slyfield, Gosden Hill and Blackwell Farm sites) on a like for like basis give a housing provision of 2108 homes with a total housing figure of 13860 which means only 15% of new homes are allocated in the original definition of the town centre or urban area, against the 25% allocation in 2014.

<table>
<thead>
<tr>
<th>Area allocation</th>
<th>2014</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town centre</td>
<td>1939</td>
<td>1135</td>
</tr>
<tr>
<td>Urban area (exc Gos, Sly &amp; Bla)</td>
<td>1500</td>
<td>973</td>
</tr>
<tr>
<td>Slyfield, Gosden, Blackwell</td>
<td>5250</td>
<td>4800</td>
</tr>
</tbody>
</table>

RPC takes issue with the approach taken to meeting housing need within the Borough as a whole and objects to adopting the whole of the OAN as the housing requirement in a Borough which is almost 90% Green Belt and which contains
significant areas of AONB.

20. RPC note that Core Strategies in other constrained areas have been found to be “sound” despite a housing requirement significantly below AON. (see for example Brighton and Hove City Plan 2016).

The approach taken by the Council does not appear to have understood or followed the decision of the Court of Appeal and judgement of Lord Justice Keene in City of St Albans v Hunston Properties plc [2013]EWCA Civ 1610 at

“There is no doubt, that in proceeding their local plans, local planning authorities are required to ensure that the “full objectively assessed needs” for housing are to be met, “as far as is consistent with the policies set out in this Framework”. Those policies include the protection of Green Belt land. Indeed, a whole section of the Framework, Section 9, is devoted to that topic, a section which begins by saying “The Government attaches great importance to Green Belts”; Paragraph 79. The Framework seems to envisage some review in detail of Green Belt boundaries through the new Local Plan process, but states that “the general extent of Green Belts across the country is already established.” It seems clear, and is not in dispute in this appeal, that such a Local Plan could properly fall short of meeting the “full objectively assessed needs” for housing in its area because of the conflict which would otherwise arise with policies on the Green Belt or indeed on other designations hostile to development, such as those on Areas of Outstanding Natural Beauty or National Parks.”

Despite this clear guidance from the Court of Appeal, the Council appears to have adopted the full OAN as the basis for the Plan. This in turn, and taken together with the emphasis on providing new housing in the Green Belt has led to removal of protection of the Green Belt from places previously within the Green Belt, by insetting of land in and around settlements to exclude them from the Green Belt and by the allocation of land within the Green Belt in order to allocate it for housing.

While RPC has not carried out its own OAN assessment it is noted that Table 1 of the PSLP indicates delivery well excess of the requirement identified in Policy S2 for the period 2018-2033. Paragraph 4.1.12 of the Plan confirms that the number of new homes shown in Table 1 is greater than the figure in the policy and purports to justify this as building flexibility into the plan and to demonstrate that the strategy is capable of delivering the target. The extent of oversupply in the Plan (130% of OAN) is not a figure derived from national policy and appears to be arbitrarily chosen. National policy in the NPPF states the requirement “to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”. NPPF 82 states: “Once established, Green Belt boundaries should only be altered in exceptional circumstances…” There is no “exceptional” need for flexibility in Guildford Borough and certainly no case is made out to support such a significant over-supply.

In all the circumstances, RPC do not accept that either the housing requirement of 693 dwellings per annum or the proposed Table 1 delivery is reasonably justified. The plan has not been drawn up in conformity with the NPPF. The balance between housing need and the exceptional circumstances required to justify Green Belt boundary alterations is not made out.

The policies of the Plan are therefore not “sound” in this important respect and both the requirement in Policy S2 and the Planned Delivery between 2018 and 2033 should be modified by significant reductions in the number of dwellings proposed in each case.

Accordingly, RPC objects to the scale and distribution of housing proposed in Table 1 of the Plan “Proposed Delivery between 2018 and 2033”. The proposed delivery plan does not constitute sustainable development, would result in loss of rural character, harm to heritage assets, urbanisation, increased traffic and intensification of use and social isolation and harm to community cohesion.
RPC considers that the proposed Planned Delivery is so misconceived and so fundamental to the Plan that it is hard to see how it could be modified without large tracts of the Plan being re-written. Without substantial modification and rewriting, the Plan is not sound within the meaning of section 20 and paragraph 181 of the NPPF. RPC recommends that the Plan should be withdrawn or at least substantially modified by reducing significantly and re-distributing new housing currently proposed for the rural area in Table 1 Planned Delivery and by making consequent main modifications to the Plan.

RPC consider that the spatial strategy does not represent sustainable development, is not sound within the meaning of section 20 and paragraph 182 of NPPF and fails to address the key issues for Guildford in a sound and sustainable way.

119. The Plan will not deliver sustainable development in accordance with the policies of the Framework. Rather it will lead to serious degradation of the rural environment, erosion and piecemeal development of vital Green Belt land, cause harm to heritage assets, the intensification of use and urbanisation and access to new development principally by motor car, leading to congestion or upgrading of rural roads at the expense of rural character.

120. The effect on existing and future residential communities will be diminution in social cohesion, reduced quality of life and substantial harm to the amenity.

121. The overall housing land requirement in Policy S2 and the Proposed Delivery of housing in Table 1 of the Plan, as well as individual allocations in the Plan considered above, are not founded on a robust and credible evidence base.

122. The planned 30% oversupply of housing sites will make monitoring impossible and will lead to a de facto housing requirement which significantly exceeds the OAN.

123. RPC objects to the above proposals in the PSLP in principle and on the basis of the above comments and recommendations and asks that the Plan should be modified accordingly or withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18670</th>
<th>Respondent: 15278465 / Chris Wright</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT to the Borough Wide Strategy (Policy S2)**

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work...
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
second period and 3,945 in the final period. Whilst there is no requirement to distribute delivery evenly throughout the plan period it cannot be considered to be ‘good planning’ to provide fewer units than needed in the early phase of the plan and risk falling short of the increased delivery requirement at the end of the period, particularly when the most recent figures * (October 2014 to October 2015) show a net addition of just 404 units to Guildford Borough’s Council Tax Base, reflecting a continued shortfall against the annual figure of 693 homes, as last year’s SHMA indicated. The stated target of just 500 units in 2018/19 indicates an unwillingness to take timely steps to address the historic and continuing shortfall, thereby exacerbating the housing problems in the borough. At the rate proposed, the SHMA figure for Guildford Borough will not be met until the fifth year of the Plan.

* These figures are sourced from a DCLG dataset published in December 2015 to support the provisional 2016-17 allocations for the New Homes Bonus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3492  Respondent: 15280737 / Miller Developments (David Milloy)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In introducing the site allocations, the Plan confirms that the objective is to bring forward housing sites in the earlier stages of the plan period, to help boost housing supply. It is acknowledged also that those sites that are constrained and are identified to come forward in later years should be encouraged to come forward sooner.

Miller is once again challenging the spatial strategy and its over reliance on larger strategic housing allocations (those over 1000 dwellings) on the basis that they are dependent upon the provision of infrastructure, especially highway improvements, which are yet to be specified, costed or accurately programmed for delivery. Although there is now some additional detail (such as what improvements will be necessary along the A3) the Council has still not indicated whether such changes will provide the necessary highway capacity and how they will be funded.

We reiterate our view that the Guildford Borough would be far better served by a more flexible approach that enabled a greater number of modestly sized sites, properly distributed across the borough - on a scale that was put forward in earlier iterations of the Local Plan. Whilst some of the strategic sites have their attributes, they can only realistically be partially developed during the Plan period (subject to wider infrastructure provision), so alternatives do need to be developed. Even though the Normandy / Flexford site (which had a number of deliverability issues) has now been removed, there remain concerns about the likely AONB restrictions in relation to the Blackwell Farm site.

It is considered that the Plan should identify a number of more modestly sized sites (such as H8-C) across the borough as a whole, as an alternative and / or in addition to relying almost exclusively on the larger allocations.

We therefore reaffirm our view in support of H8-C, which is ideally placed to deliver housing in the early stages of the Plan period. If GBC is unwilling - as it appears - to make a positive decision in respect of this allocation, we therefore look to the Inspector (when he is reviewing GBC’s questionable approach to OAN and Woking’s unmet need) to consider including this site to help address the shortfall. H8-C would:

1. Provide for a level of development that respects the character of - and be subservient to - the existing village.
2. Not necessitate access through the village which is already constrained by the narrow road layout, on street parking, the left in left out access junction on the A322 and the school traffic that causes congestion during the AM and PM peak periods.
3. Provide access to the school from the south which would remove school traffic from the village, particularly as the school continues to expand its pupil numbers over the coming years (as it does again this coming September).
4. Provide safe pedestrian and cycle routes and highway improvements to the A322 including a new pedestrian crossing to enhance access to the school, in line with the objectives of the recently approved School Travel Plan.

5. Ensure a scale of development which can be accommodated with improvements to the foul sewers, an upgrade of the electrical power and the new access. These improvements are of a level that would not constrain the ability to deliver a policy compliant level of affordable housing.

6. Ensure that any minor loss of common land would be compensated for and the development can provide on-site public amenity space which links via existing and proposed footpaths to the immediately adjacent common.

7. Ensure that the purposes for designating the Green Belt would be largely unharmed as the site is well screened by existing mature tree and hedgerow boundaries that will preserve the openness of the wider Green Belt. For the reasons set out above the other purposes of the Green Belt would be maintained.

For the above reasons Miller maintains that Site H8-C (which comprises of land at Hook Farm / Hunts Farm) should be allocated for development which would ensure housing coming forward during the early part of the Plan period and reduce the risks associated with relying on the larger housing allocations which are infrastructure dependent which could affect their viability and delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18452</th>
<th>Respondent: 15283105 / Chris Woods</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4648</th>
<th>Respondent: 15284385 / T.W. Turnill</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Guildford Borough Council, unlike the other Surrey Councils, insists that there is a requirement for double the number of houses in this area compared with theirs. That estimate was provided by a firm which refuses to disclose how it came to that conclusion on the grounds of "commercial sensitivity". Thus, the Council has no way of verifying how accurate this estimate is, or what assumptions were used in coming to this figure. It is imperative that this arbitrary figure be challenged, and another firm used who will be transparent in the assumptions it makes, so that a proper estimate can be used.

In summary, and in view of the points I have made above, I would be grateful if you would log my strong object ions to the proposal to build 1100 houses between Glaziers Lane and Westwood Lane in the village of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2553</th>
<th>Respondent: 15284801 / Linda Jarvis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2557  Respondent: 15284993 / Samantha Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy)

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2572  Respondent: 15285121 / Audrey Boughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. In any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, with Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used...
elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Cladon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Cladon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLP16/2603  **Respondent:** 15287489 / John Bound  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Brownfield sites in the surrounding towns should be developed before open countryside is decimated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLP16/2611  **Respondent:** 15291905 / Jo Hutchinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the over development of any one area in the borough

I object to the limited consultation period

I object to the last minute inclusion of new sites with less than 14 days notice
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3647  Respondent: 15292129 / Shirley Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough. There must be other areas that can be development to share the impact it will have on local area and do we really need all these developments. I believe we don’t and object to the amount of developments plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2652  Respondent: 15293793 / Anita Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

DISPROPORTIONATE DEVELOPMENT - The Council are proposing thousands of houses in Send, Ripley and Wisley, areas that already suffer horrendous traffic issues as main feeder routes to the A3 and M25. The whole road network is under extreme pressure during rush hours and in the event of traffic accidents or roadworks gridlock is often the result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2663  Respondent: 15294113 / M J Hickman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to this plan putting an overly large strain on one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2687  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the lack of any constraints being applied to the housing policy.

GBC's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2688  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to imbalance of development in the Borough.

There is too much development in the north east of the borough (Wisley [A35], Ripley/Send (A43] and Glandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2714  Respondent: 15295809 / David Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( Yes )
I object to the loss of local community identity

A 5 mile stretch between M25 and Burpham is proposed to get more that 5000 more houses which will lead to the urbanisation the villages into one mass.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2706  Respondent: 15296545 / Catherine Lees  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy.

There is too much development in Wisley (A35) Ripley/Send (A43)-and clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

Why doesn't GBC apply any constraints to reduce the overall housing figure as all the other Borough Councils in Surrey do? The figures are not credible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2722  Respondent: 15297249 / Christine Gates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development proposed for one area of the borough. Already the traffic flow problems around Guildford, Ripley, Cobham, Byfleet are horrendous in rush hour, building up from 3.30 pm and reaching virtual gridlock by 5pm. As residents we already feel imprisoned between 7.30am to 9am and 3.30pm to 6.30pm because the roads are clogged with traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2755  Respondent: 15298017 / Margaret Cousins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
4. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the high number of homes proposed. The overall reduction in the borough is only 5.6% and 12,426 homes is still excessively high and probably no longer justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound.
A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years.

It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth.

The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.
The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with
the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to thisendeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2820  Respondent: 15299425 / Tim and June Yorath  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 – Borough Wide Strategy

We object to Policy S2 on a number of grounds:

1. The housing number of 13,860 new homes is excessive. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is in any event based on an arbitrary and inappropriate Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate and Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. These concerns have been raised repeatedly since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinize it. The absence of a ready alternative, however, does not make “West Surrey” as a Housing market Area reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

4. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. We have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the
authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

5. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

6. The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

7. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

8. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

9. This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

10. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

11. The Plan is out of balance in proposing 36% of all new housing in the three wards of Lovelace, Send and Clandon and Horsley. These are currently rural areas whose identities will be greatly and detrimentally changed by these proposals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I have just become aware of the proposals for extensive housing in and around Guildford. Whilst I appreciate that there is a shortage of low cost and social housing in this area, I feel that the number of houses proposed to be built is excessive. Such development would not only put too much strain on services but would also eat into the Green Belt land which would impact on quality of life of existing and new residents alike.

I understand that some high density ie high rise housing is proposed. The two existing residential blocks along the Portsmouth Road have been a blot on Guildford's landscape since they were built. There has been endless evidence to show such schemes have failed not only from a town planning viewpoint but more particularly from the position of those living there.

I urge the council to deal with these proposals by exercising balance so that some new housing can be provided without destroying the beauty and unique identity of Guildford. In this way those who come to live here can enjoy the benefit that those of us who have lived here for some time have enjoyed for so long.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and why were Councillors not allowed to scrutinise it? The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2889</th>
<th>Respondent: 15301409 / Marian Simonds</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. I OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2896</th>
<th>Respondent: 15301601 / Tina Grear</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2899</th>
<th>Respondent: 15301761 / Paul Norman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DISPROPORTIONATE DEVELOPMENT - The Council are proposing thousands of houses in Send, Ripley and Wisley, areas that already suffer horrendous traffic issues as main feeder routes to the A3 and M25. The whole road network is under extreme pressure during rush hours and in the event of traffic accidents or roadworks gridlock is often the result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/2900  Respondent: 15301921 / Deborah Bennesch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The new draft Local Plan is going to destroy the identity of our villages, clog up the roads with 24hr congestion and take away our Green Belt status- its appalling!!

I enclose my objections to this plan.

I don't want to live in an extended London!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2904  Respondent: 15302081 / C.A. Sayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2906  Respondent: 15302081 / C.A. Sayers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2924  Respondent: 15304033 / R.E Greenhalgh  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have read the objections raised by West Clandon Parish Council to your Draft Local Plan and I believe that its position raises a number of issues that we at Ryders feel strongly about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2926  Respondent: 15304065 / Andrea Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.

I strongly object to the limited consultation period.

I strongly object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2933  Respondent: 15304481 / E Roker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.
I object to the last minute inclusion of new sites with less than 2 weeks notice.
I object to the limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2939  Respondent: 15304737 / Pamela Orthodoux  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5). I object to the Borough Wide Strategy (Policy S2).

The proposal by Guildford Borough Council for 13,860 new houses without any constrants to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The proposals are for too much development in the north east of the borough (Wisley, Ripley & Send). I understand 36°/o of all the Plans new housing is proposed in this area, which has only 11°/o of the existing housing.

Ultimately all this new housing will merge Wisley, Ripley, Send, Clandon all together and they will cease to be villages and become one large urbanisation!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/2942  Respondent: 15304897 / Richard Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I OBJECT** to the Borough Wide Strategy (Policy S2)
a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour, commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clendon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the 'West Surrey' tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, 'West Surrey' is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside 'West Surrey'. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make 'West Surrey' reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's 'need'. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered 'sound'.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is 'deliverable' and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission.

Constraints in the supply chain and maintaining profit levels have been more important. The plan cannot be considered 'deliverable'. In addition, the number of homes proposed, plus existing planning permissions, plus expected 'windfall' sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a 'plan' that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. Ibelieve the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Glandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Glandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Glandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3009</th>
<th>Respondent:</th>
<th>15312769 / Norah Johnson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. This will also increase the amount of traffic heading to the M25, as these new developments will certainly attract commuters, and the there are already long tail backs on the A3 every morning onto the M25 disrupting local travellers and this will only get worse. The Council seem to have completely ignored these problems by promoting so many sites in such a short stretch of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3024</th>
<th>Respondent: 15312961 / Alison Johnson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of the entire Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles), which will obviously lead to a merging urbanisation of the villages. This will also increase the amount of traffic heading to the M25, as these new developments will certainly attract commuters, and the there are already long tail backs on the A3 every morning onto the M25 disrupting local travellers and this will only get worse. The Council seem to have completely ignored these problems by promoting so many sites in such a short stretch of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3026</th>
<th>Respondent: 15312993 / M.J. Lindsay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

Section page number
Page 1062 of 1722
Document page number
1763
I object to the exaggerated ambition for growth. This will ruin Guildford.

Related to the above, development should not be given a favourable assumption. Traffic frequently grinds to a halt as it is. Where are all these people and cars supposed to go? I object to the strategy.

The numbers in which the whole thing is based and the calculations based on them seem to be hidden away. I object to this. The supposed need for housing for a growth in population is too high. What about Brexit? House prices become inflated. I object that young families, people born in Guildford and people earning normal salaries are priced out. These people need homes before catering to more executive housing. I object to building on the green belt and in the countryside areas. There seems to be plenty of brownfield but it is in little "pockets" and so not as profitable for developers.

Where has quality of life been factored in? The frustration of all the time spent sitting in traffic-jams deters people from going out. That is a fact. I am an asthma sufferer and the traffic fumes in stationary traffic are really bad.

Where you have so many people having to live crowded in with parents and people who can only afford to rent one room, this is a bad quality of life. We seem to be going backwards. It is too much growth for the wrong reasons and intended to be put in the wrong places. I object to this.

Visitors will not want to come here if they can not move on the roads and it becomes like Croydon. People do not seem to want to use the shops we already have. We do not need more shops. I object to more space being planned for offices, shops, warehouses.

P.S. My car journeys are mainly to and from work, also in Guildford. It is too far to cycle and there is no bus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan

We object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

These are our main reasons for objection:

1) **WE OBJECT TO** the local plan, as the development proposed is not sustainable. It will damage local communities by over development. The development should be in urban areas where there is sustainable transport infrastructure.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/3071  **Respondent:** 15314881 / Gill Haig-Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a **resident of Ripley** and also a **BUSINESS OWNER AND EMPLOYER** in the area I am **strongly objecting** to the DRAFT LOCAL PLAN for the following reasons

1) The disproportionate proposed development in certain areas of the borough

   Whilst I accept there has to be growth in housing, I see it as grossly unfair to burden certain areas more than others

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/3079  **Respondent:** 15315009 / Edward Dennis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3090  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

• Guildford is planning to build nearly 14000 houses (25%) many more than Woking, Waverley or surrounding boroughs. We feel that the number proposed is far too high. We feel that for Guildford expansion of 25% over the coming years is unrealistic, and we wonder what is driving this expansion.

• We note that 64% of the land to be used for this expansion is to come from the Green Belt and from agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3094  Respondent: 15320641 / G.M & D.J Elvidge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed diminution of agricultural land raises similar issues. As I understand it, our country only produces 54% of its food, the rest being imported. There is nothing so important to a population than the security of its food supply, so that this is a political issue of the first importance.

We should make a political decision as to the sources of our food, and what part of it should be locally produced. That should be decided first, before there is any diminution in available agricultural land. It should not be decided upon as part of a building plan, driven by bureaucrats.

3) The areas designated in the plan for building purposes are areas of outstanding natural beauty, including ancient woodlands and heritage sites. Our country has already been more than sufficiently vandalised during the industrial revolution and afterwards. A halt must be called sometime, or else the entire country will be smothered in buildings. On those grounds alone we oppose this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) Air quality would obviously be adversely affected by the massive increase in traffic which would follow the implementation of this plan. Air pollution is already over the legal limits at the A3 end of Compton.

4) Brownfield sites should clearly be used in priority to Green Belt land. In this context it is surprising that 30% of brownfield sites are devoted in the plan to retail as retail is now being diminished by the Internet. The council should think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to POLICY S2 –Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3104  **Respondent:** 15320801 / J.A Sayers  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey Cow1ty Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3513  **Respondent:** 15321217 / Sally Rule  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. Is this fair and reasonable?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3113  **Respondent:** 15321729 / Fiona Keywood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

**I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to object to the Current GBC local plan and the dramatic detrimental affect this will have on the rural community.

The Guildford planning Department have failed continually to listen to the local community to such a degree that we residents have to question their motives and integrity. The day before they unanimously rejected the former horley Airfield, Three Farm Meadows okanning application They were already aware that it was the intention to include the site in the GBC local plan remove its green belt designation. I was appalled at the twice that they are putting the local residents of ockham thorugh.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3133  Respondent: 15322241 / K. Paulson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed development of over 5000 houses in toatl is totally disproportionate to the surrounding area is a density more suited to an inner city.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3135  Respondent: 15322241 / K. Paulson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The developers have failed at every level to engage with the local innhabitants and have shown intent on one thing, which is to make maximum profit .

Are you really going to ignore every single objection and show yourselves to be undemocratic and unable to follow renamed arguements and objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3130  Respondent: 15322273 / Alan Dobson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
As a Guildford resident for a long time I have seen all the changes some good some bad but the supposed number of house's being planned is too high, while I agree there is a case for more housing but not the numbers suggested. Traffic is at a standstill most days, hospital is not coping with the numbers now so more residents will not help. This is the second attempt to expand Guildford and not taken in to account residents point of view, all the objections still stand from the previous plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3139  Respondent: 15323041 / Jane Doherty  Agent: 

I have carefully considered the Proposed Submission Local Plan which Guildford Borough Council ("GBC") has now published for public consultation. My comments are set out in this letter.

I have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, I do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics ("ONS") projects a population increase of some 15% for Guildford Borough over this same period.

I also note that the Proposed Submission Local Plan includes the statement "We will continue to protect the Metropolitan Green Belt". I fully and support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore OBJECT to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by my comments on specific site allocation policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics ("ONS") are projecting a population increase of some 15% for Guildford Borough over this same period.

I accordingly OBJECT to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3175  Respondent: 15323041 / Jane Doherty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not share the same vision for the future of Guildford Borough as GBC, although I recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC’s desire to pursue a ‘Forced Growth’ policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets - the proposed 25% increase in housing stock in particular - create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that "We will continue to protect the Metropolitan Green Belt" does not fool anybody.

Accordingly I OBJECT to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3176  Respondent: 15323841 / Claire Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---

Section page number 1071 of 1722  Document page number 1772
7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3202  Respondent: 15324129 / Giorgia Argano  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I own a property located in Ganghill and am emailing in respect of the above to communicate my support of the Guildford Residents Association's response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3219  Respondent: 15324705 / Isobelle Keywood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3221  Respondent: 15324833 / Ann Gifford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate amount of development planned for one area of the borough. Smaller developments around the whole of Guildford infilling and using brown field sites should be the priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3245  Respondent: 15326273 / John Haslam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3247  Respondent: 15326273 / John Haslam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners ’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3249  Respondent: 15326273 / John Haslam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/3258  **Respondent:** 15326401 / Claire Haslam  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/3265  **Respondent:** 15326401 / Claire Haslam  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/3256  **Respondent:** 15326465 / James Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

7. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2766   Respondent: 15326657 / Janet Davie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to object to Guildford Borough’s Draft Local Plan as detailed below. Please show my comments to the Planning Inspector who will decide about the Local Plan. Please also acknowledge receipt of this letter.

1. General Evidence and Policies

   • **Housing Requirement**: I **OBJECT** to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.

   • **Inset Green Belt land**: I **OBJECT** to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

      This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.

      The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.

      There are no special or exceptional circumstances identified which justify removal of the Green Belt status.

      Developments in the area will harm the open aspect of the area and views associated with the Wey.

      Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

   • **Process**: I **OBJECT** to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

   • **Process**: I **OBJECT** to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

2. General Policies relating to Send Parish. Sites (A42, A43, A58)

   • **Traffic levels and associated environmental issues**: I **OBJECT** to the proposed significant developments in Send because these will increase both traffic movement levels throughout the Parish and the level of traffic related pollutants over wide areas in and surrounding the Parish.

   • **Housing Numbers**: I **OBJECT** to the scale of development within Send because the increased number of houses proposed (500 + 2 traveller pitches + 8 Traveller/Showman Pitches/Plots) will grow the number of houses in Send by 25%. This is incompatible with maintaining Send’s current rural nature and cannot be supported by existing infrastructure, including education and medical facilities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3268  Respondent:  15326785 / James Hampton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3273  Respondent:  15327073 / University of Surrey (G Q Max Lu)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Local Plan marks a defining point for Guildford and its future. The University's involvement with this plan is three fold:

• As civic partner, the University benefits from and contributes to the health and prosperity of the town

• As a major employer the University and its staff are materially affected by the existing housing and infrastructure deficits

• As a land owner the University is planning to develop Blackwell Farm to support housing, infrastructure and employment

The University has submitted a formal and comprehensive response to the consultation through its planning advisors Terence O'Rourke. This letter seeks to reinforce the most material points of that submission. These are - the University is supportive of the Local Plan process and is generally supportive of the draft. A summary of the main comments is attached as an appendix to this letter.
The future development of the town and the University are closely linked and it is clear that their synergetic relationship can create even greater vitality and prosperity for the region. The University is committed to building on this relationship as the economy of the UK moves further towards the opportunities of science and innovation. For such an innovation-based future the Borough will require access to young talent, a sense of vibrancy that is attractive to young people, housing capacity, employment land for the technology, engineering and science sectors, and the infrastructure to help to support these aspects of economic development.

As Vice-Chancellor of the University of Surrey I should like to reiterate the importance of the Local Plan to the future of the Borough and the University and would urge the Council to adopt this plan after careful redrafting of Policy H1.

The relationship between the University of Surrey and Guildford Borough Council goes back to the early 1960s when the Borough supported its own development by attracting the University of Surrey to relocate to the town.

Today the University and the companies on its Research Park bring £1.7bn of gross added value to the UK each year and directly or indirectly support 17,312 UK jobs, 10,644 of them in Guildford. The University is ranked 4th in the country in the Guardian 2016 and 2017 League Tables and was awarded the University of the Year Status by The Times/The Sunday Times in 2016. The wholly-owned Surrey Sports Park attracts international teams and high-profile events and is appreciated by local residents who pay well in excess of 3/4 million visits to the park each year.

The University, the Research Park companies, the Royal Surrey County Hospital and Guildford Business Park are located in an area of roughly a square mile to the west of Guildford Town Centre. This square mile covers less than 1% of Guildford Borough but generates around 45% of the Gross Value Added of the Borough. The experience of the many staff working in the square mile and the University students is affected by housing and infrastructure deficits and the University's plans and this response reflect that context.

The underpinning need for the Local Plan is clear:

- Population growth in this area is rapid and this will continue
- The UK is already in housing crisis, with the younger and future generations particularly badly affected
- The housing crisis is particularly serious in the South East and in this Borough
- The economy must be allowed to grow to deal with the country's debt burden and population growth
- To enable economic and housing growth, infrastructure deficits must be tackled
- Guildford is an integral part of the dynamic fast growth area of London and the South It cannot distance itself from that growth and cannot avoid dealing with the consequences of it.

The University is, of course, acutely aware both of the social costs of growth, and of the infrastructural deficits that our town has to contend with. Investments by the University in student accommodation over the past ten years are approaching £130m (including £85m in new accommodation); a further sum of around £75m is due to be spent delivering 1,150 new units over the next three years and further accommodation will be built to support new demand as funds permit.

The University is also all too familiar with local infrastructural deficits and has itself had to contend with well-documented traffic and parking issues and restrictions. The University's own investment in transport infrastructure and on public transport subsidies has cost many millions over the past ten years, not least for the new Egerton Road Junction. It has always been known that this junction was just part of a more comprehensive solution which would need to include access to the West through a road across Blackwell Farm to the A31. That new road infrastructure would benefit the University, the Research Park, the Hospital and Guildford town itself, and the development of Blackwell Farm provides an excellent opportunity to deliver and fund those essential improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3276  Respondent: 15327137 / Sally Edwards  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3281  Respondent: 15327201 / Sam Philps  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3292  Respondent: 15327521 / Dion Slattery-Hill  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6670</th>
<th>Respondent: 15327745 / T S Pilkington and C A Gray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In the Key Evidence document "Guildford Borough Economic Strategy 2013-2031” makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages, therefore, why are changes been considered?

13,800 new homes over the Plan Period 2013 to 2033 is too high and unsustainable in Guildford's villages.

The current village size of East and West Horsley is not adequate to support an increase in homes. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and w ill be
totally out of character with the existing mix of different housing styles, historic buildings and layout of the village and, therefore, we feel this is inappropriate development within the Green Belt. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, ie for young people and for elderly people who wish to downsize to a smaller home.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6672  **Respondent:** 15327745 / T S Pilkington and C A Gray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

On top of the Local Plan proposals there are other planning applications that require consideration/objection eg. Land adjacent Cranmore Lane, including Goodhart-Rendel Community Hall and the development of Bell & Covill which all impact on the village settlement area.

Please give due consideration of our objections/concerns when reaching a decision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3307  **Respondent:** 15327873 / Susan Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners ‘views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/3303  Respondent:  15327905 / Julia Cook  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 –Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

3. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

4. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

5. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860.
So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3325  Respondent: 15328161 / Louise Midgley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3337  Respondent: 15328481 / Millie Midgley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/3351 | Respondent: | 15328865 / R.A. Love | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/3354 | Respondent: | 15328993 / B. Joseph | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the disproportionate amount of development in one area of the borough (Policy S2). The strategic sites of A43 Garlick's Arch, site A25 Gosden Hill and site A35 Wisley Airfield are all within a 5 mile distance and represent over 35% of all housing allocated in the borough, essentially creating coalescence of all local villages. The individual identities of each village will be lost. We are NOT urban villages but are rural villages with thriving engaged local communities, each with their own individual character and historical identity. I also believe that Ripley has already grown significantly over the past 5 years, with an approximate 8% increase in housing. However, all these have been small developments of generally less than 10 units and as such, have been able to successfully merge and be absorbed into the existing community. This will not be the case with the huge numbers of homes proposed on the 3 strategic sites mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7831  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the disproportionate amount of development in one area of the borough (Policy S2). The strategic sites of A43 Garlick's Arch, site A25 Gosden Hill and site A35 Wisley Airfield are all within a 5 mile distance and represent over 35% of all housing allocated in the borough, essentially creating coalescence of all local villages. The individual identities of each village will be lost. We are NOT urban villages but are rural villages with thriving engaged local communities, each with their own individual character and historical identity. I also believe that Ripley has already grown significantly over the past 5 years, with an approximate 8% increase in housing. However, all these have been small developments of generally less than 10 units and as such, have been able to successfully merge and be absorbed into the existing community. This will not be the case with the huge numbers of homes proposed on the 3 strategic sites mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7839  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the way in which this consultation process has been processed by GBC. Many residents remain unaware that such significant proposals are afoot, which will have a 15 year affect on people's lives. If you are not a regular reader of the Surrey Advertiser, you would probably not know anything about the Local Plan. Indeed, the majority of information provided to residents of the borough has been provided by either parish councils or concerned local residents groups such as Wisley Action Group, Save Send Action Group, Ripley Action Group, CPRE and other bodies. This is not acceptable in a democratic society, particularly in view of the fact that the Conservative borough councillors had an election promise to protect the Greenbelt which they fundamentally appear to be totally disregarding. In essence, residents are trusting GBC to uphold their election promises, without being given the information regarding the revised Local Plan. I do not accept that local plan documents held in a small handful of local libraries constitutes appropriate consultation. I have attended many
local meetings in Clandon, Send, Merrow and Ripley (all of which have been organised by local bodies, NOT GBC) held to discuss the proposals in the 2016 Local Plan. I can honestly say that there is whole hearted disapproval from every aspect of each community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7840  Respondent: 15329441 / Suzie Powell-Cullingford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion, this revised 2016 Local Plan is not fit for purpose, is unsound does not represent in any way how most exciting residents wish to see their homes, communities and borough develop over the next 15 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3369  Respondent: 15329505 / Martine Early  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3382  Respondent: 15329537 / J Sweby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I request confirmation that this protest has been received, registered and read by the planning inspector. I would also like a reply to my two questions. I have sent my objections to Sir Paul Beresford MP.

I object to the fact that GBC has made considerable changes to their April 2016 proposals without full consultation.

Questions:
1) As there is a freedom of information act I request that the minutes of the planning meeting is published in the Surrey Advertiser. I also request that the planning officers and councillors publish the way they have voted. The electorate have a right to know which of their councillors do not care about the lives of the people in their borough.

Will this be done? If not why not?

2) When the village of Shalford was disrupted by the improvements to the A3 compensation was paid to the residents. How much has been put aside for the compensation to the residents of Send Marsh and Burnt Common who will have their quality of life reduced by the increase in noise and pollution?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3374  Respondent: 15329569 / P.J Kirkwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners ‘ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3386  Respondent: 15329825 / Sylvia Lodger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3392  **Respondent:** 15330017 / Honor Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the disproportionate allocation of housing in this particular part of the bourough. Indeed, over 23% of the plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3410  **Respondent:** 15331393 / Maurice Frayne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**SCALE OF DEVELOPMENT**

The Local Plan housing numbers are too high. Combining East and West Horsley together with the new town at the former Wisley Airfield and those at Ripley would completely urbanise the area between the A3 and the A246. In addition, the Local Plan seems to have made no allowance for the infrastructure required to support this massive development.

At present our drains and water supply are challenged at various times during the year, further development would cause failures within both systems. The volume of traffic using the local roads has increased substantially in the past decade, further urbanisation and its consequent increase in vehicle movements on the local roads, A3 and M25 intersections would create further congestion and a substantial increase in air pollution levels to an already highly polluted area.

The nearest station, Horsley, which most commuters would drive to as there is little other public transport, would be unable to cope with the increase in commuters at peak times. Even now it is now difficult on occasions to find parking at either Horsley or Effingham stations.
The existing local medical facilities will be unable to cope with the proposed increase in population. The Royal Surrey Hospital would not have the capacity to cope with the increase in patient numbers created by the proposed Local Plan development.

AVAILABLE DEVELOPMENT SITES

The Local Plan does not take into account the existing sites still undeveloped within Surrey. There are Brownfield sites available, which have not been developed and would provide enough land to meet the need for affordable local housing. Many commercial sites are unused and should be developed before any planned use of Green Belt land.

I ask Guildford Borough Council to reject the existing plan and review use of Brownfield sites and existing permissions for development rather than the development of precious Green Field sites, which have been nationally recognised as protecting the quality of both our urban and natural environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3417  Respondent: 15331489 / Harry Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3420  Respondent: 15331617 / M.H MacFarlane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/3423  **Respondent:** 15331681 / Anne Lowndes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/3428  **Respondent:** 15340929 / Claire Smylie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3600  Respondent: 15342401 / M.J. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migrati These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to voice our objections to the development plan for the Horsleys. The plan to develop a massive 593 new houses in the area over the next 5 years seems to be out of proportion with the national estimate for population growth. It will have a detrimental affect on schools and medical facilities and will massively change the feel of the green belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3652  Respondent: 15343905 / Ian Dwyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the following GBC policies: S1, S2, H1, H2, H3, P1-5, E5-7, E9, D4, L1, P12, P13, P14.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3677  Respondent: 15344737 / Alex Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please take the below as my feedback, as a West Horsley resident, on the Draft Local Plan.

Excessive new housing in West Horsley

The proposal for 385 new houses in West Horsley is completely excessive and way out of line with all other Guildford Villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3684  Respondent: 15344929 / Leon Sunkin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to object to the above plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3712  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3718  Respondent: 15345281 / Alexandra Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA) : the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West, but all lie well outside "West Surrey".
Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3767  Respondent: 15347937 / Margaret Brazier  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I base my objections on the following submissions:

1. The addition of 385 extra dwelling is out of all proportion to the size of the village, an increase of 35% in existing West Horsley households – greater than any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3994  Respondent: 15347937 / Margaret Brazier  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

O But the big and unanswered question is who is expected to benefit from this plan? Surely not the suffering ratepayers already living in the village. Nor hardly the unsuspecting newcomers who will have to pay scandalous inflated prices for whatever dwellings eventually emerge (a development in West Horsley’s Weston Lee of “affordable” tiny semidetached bungalows originally for the elderly currently change hands at little short of half a million) I suspect that the only people rubbing their hands with glee will be greedy developers, joyful estate agents and of course the Council planners if they are able to report to Government Ministers that “we have met our new build housing targets – and Oh by the way in the process- despite tremendous opposition- we have been able to completely destroy yet another historic heritage village.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3781  Respondent: 15348033 / Peter Nicholas  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2).

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a
merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3803  Respondent: 15348321 / Vivien Sale  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly believe that Guildford must constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3826  Respondent: 15348481 / Donna Styles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I OBJECT TO – the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3833  Respondent: 15348705 / Richard Shaw  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to object to the new Local Plan that was published for consultation by Guildford Borough Council on 6 June 2016.

The Plan proposes a large number of houses for six development sites in East and West Horsley. I find no justification for this scale of development, which far exceeds local need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3873  Respondent: 15349217 / Philip Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. The development of up to 385 homes on the 4 proposed sites in West Horsley (Policy A37, A38, A40, & A41) are at much higher densities than exist in the village settlement and would be totally out of character with the existing mix of different housing styles and layout of the village. The proposed increase of up to 385 homes represents an increase of 35% of the current number of homes which is excessive in the light of the infrastructure capability – see point 4 below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3878  Respondent: 15349281 / Steve Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small.

c. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clndon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13638   Respondent: 15349281 / Steve Aptel   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
West Horsley is being considered as two separate plots and therefore the allocation of housing is increased due to this. I feel baffled as to why West Horsley is split into North and South since it has only one small section of shops near Bell and Colville. The village should be considered as one entity. When viewed as such, it is clear that the proposed density of housing is an extraordinarily high percentage, once again far outstripping identified need, none of which warrants building on green belt land, or reclassifying green belt land because there are no exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4052  Respondent: 15353089 / Alison Teece  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4064  Respondent: 15353505 / Susan Mazalon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2) The roads in our area are VERY poor. The conduct of the authorities in maintaining them is also poor. They are largely narrow lanes but with the increased traffic it can only make the situation worse for health and safety reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The roads around East Horsley from 7am onwards are VERY busy. It can take up to 20 minutes on occasions just to cross the Effingham crossroads on the A246. Any additional housing of the scale you are proposing could lead to gridlock and again safety and pollution concerns in a wider area leading to the increased need for additional policing. Has this been included in your planning?

5) Local transport is very poor meaning ever increasing car journeys on ever more dangerous roads. There is virtually no existing infrastructure to accommodate these developments or very low levels of local employment which leads to increased traffic and environmental damage. The junction currently close to the Ockham Bites café onto the A3 is HIGHLY DANGEROUS. The traffic flow here is very fast and dense making it extremely difficult to join the road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4067  Respondent: 15353505 / Susan Mazalon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6) Within East and West Horsley once again the scale of these developments and some like on the Thatchers hotel site are on pristine land that I believe has never been sprayed by agri chemicals. Surely something to cherish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4077  Respondent: 15353633 / Neal Stone  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to Policy S2: since surely Brexit invalidates the demographic data. Also there is no definite housing target given, which leaves the policy too open to future reinterpretation. The overarching impact of the plan being put in place would be to create an urban corridor connecting to the London suburbs, which would be devastating to the feel of local communities. Surely the policies cannot be seen in isolation since the effect of one on another is so significant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4084  Respondent: 15353825 / Terry Madgwick  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Disproportionate level of development in one area of the Borough - not so much the number of houses within the Burpham itself, the area in which I live, but the disastrous impact of yet more through traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4137  Respondent: 15356353 / Pam Patrick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5) To suggest building another 593 houses in the Horsley area, plus 2000 at Wisley is quite ridiculous and I OBJECT VERY STRONGLY INDEED - WE WILL BE OVERWHELMED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4140  Respondent: 15356385 / Mervyn Plumtree  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/4167  Respondent: 15356577 / Jeremy R. Miles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write in respect of the above and in defence of the Green Belt, a policy which has served us well over the past 50 or so years. Preserving the green lung around our metropolitan areas and the character and equilibrium of the villages in which we live.

Whilst I appreciate the need for more housing, I would direct you towards the many brown field site which exist where development opportunities are available without encroaching into large areas within the confines of our villages which are currently green and unspoilt creating the ambience in which we choose to make our homes.
In particular I would like to draw your attentions to the designated areas within the parishes of east and west Horsley, development of which would overwhelm the two places we all so enjoy and which would bring an unbelievable burden upon the services and residences existing at the present time.

In the event of development being permitted I foresee two outcomes, the pressure from existing services and infrastructure will bring with it the lead for further urbanisation and that land sold for redevelopment will be for the profit of the buyers who will erect five bedroom three bathroom houses rather than the smaller dwelling for which there is an undeniable need.

I feel that the array of notice boards which are being erected in the Horsley’s Dondens and Ripley more than endorse the view that changes to the status quo are unwelcome.

I urge you to resist the pressures from central Government and preserve the integrity of the Green Belt for the benefit of future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the plan for the Gosden Hill development

1. The number of houses planned far exceeds the number suggested 4 years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4155   Respondent: 15356801 / Clare Harlow   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2.

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible! This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverle An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/4266  Respondent: 15358497 / Liz Cooper-Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to object very strongly to the proposed local plan for both East and West Horsley.
To increase the number of homes by 35% is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4270  Respondent: 15358625 / Ron Best  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the most recent draft Local Plan most strongly. I accept that people must have houses to live in and work opportunities, but the first version of the Plan which I saw included development of housing and infrastructure implications which were disproportionate to the size of our village. After two years of discussion and consultation, I welcomed the revised Plan which followed because it had significantly reduced these pressures, and seemed a much fairer distribution of the necessary development.

I was dismayed when I read that, at the 'eleventh hour', a further draft had been published which not only undoes the good that had been achieved with the earlier revision, but imposes an even greater burden on this area. My first objection is to the way in which this revision was slipped in so late in the day. Frankly, this smacks of sharp practice and raises questions about the integrity of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4279  Respondent: 15358753 / Adam Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objection to the Guildford 2016 Local Plan

East Clandon Parish Council objects to the 2016 Draft Local Plan as a whole and in particular we object to the specific issues (listed below). We believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.
Our specific points are:

1. We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4288   Respondent: 15358913 / Lisa Lewis   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Objections to the Guildford 2016 Local Plan

My parents live in East Clandon, at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998.] and I frequently visit them and spend many days in the village with my family. I am currently overseas so am writing to you by email in respect of the above. Accordingly this letter will not be hand signed.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4318</th>
<th>Respondent: 15359329 / Andrew &amp; Elizabeth Robinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The proposed extent of the development to the east of Guildford, including Gosden Hill Farm, Burnt Common, Wisley and East/West Horsley will create an additional 5,000 homes within the area of a few square miles. An increase in population of 10,000–15,000 people would likely result. This calls into serious doubt the basis of the housing plan. Guildford Borough population increased by 7,500 (5.8%) between 2001 and 2011. To propose houses which can accommodate up to 15,000 people suggests an expected increase just from these few developments, and without taking into account other Borough developments, of over 10%. This increase cannot be sustainable or desirable in the context of an existing population for the whole of Guildford Borough of 137,000 (at the time of the last census).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Overall, we regard the extent of proposed development to the east of Guildford, and specifically in and around the Horsleys, to be out of all proportion to the existing housing stock. They are consequently an unrealistic set of proposals in the context of the sustainable development that can be achieved.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4342</th>
<th>Respondent: 15360065 / Alan Staines</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Many aspects of the Guildford Local Plan proposing 593 new houses in the Horsleys within 5 years of its adoption give cause for concern and indeed objection. Accordingly my views are set out below for due consideration by the appointed independent inspector as appropriate.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9575</th>
<th>Respondent: 15360321 / Jean Miller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/4363</td>
<td>Respondent: 15360993 / J Corrie</td>
<td>Agent:</td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the number of additional homes being set at 13,860 (or 693 homes per year). (Policy S2) I consider this to be too high for the growth we actually need in the Guildford area. It is unacceptable for the Council not to disclose how the SHMA is arrived at and given the fundamental importance of this figure to many aspects of the Plan, it is totally inappropriate to hide behind the comment that this is proprietary information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4370</th>
<th>Respondent: 15366209 / Corinne Singleton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

GBC plan for building a certain number of dwellings within the borough is now obsolete. The way the proposed number were calculates, I understand, are not overt so we can all understand the logic for the decisions. The need to build in such numbers was calculated in the situation we were in before 23rd June 2016. The situation has changed and we are now leaving the EU so the need to fulfil their requirements is now null and void. We will have a new Prime minister in position from Wednesday 13th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4372</th>
<th>Respondent: 15366209 / Corinne Singleton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to strongly object to Guildford Council's planning proposals to build up to 14,000 new homes under the revised draft local plan. Form the literature I have received I note with serious concern that the proposal is for large 'strategic sites' at Garlick's Arch (Burnt Common), Wisley and Gosden Hill.

It seems that you are aiming to remove our local villages from the green belt and this will allow unlimited future development and the destruction on our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT TO the disproportionate amount of development in one area of the Borough

1. I OBJECT TO the extremely limited consultation period

1. I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4374  Respondent: 15366529 / Roger Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to strongly object to Guildford Council's planning proposals to build up to 14,000 new homes under the revised draft local plan. Form the literature I have received I note with serious concern that the proposal is for large 'strategic sites' at Garlick's Arch (Burnt Common), Wisley and Gosden Hill.

It seems that you are aiming to remove our local villages from the green belt and this will allow unlimited future development and the destruction on our rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4376  Respondent: 15366529 / Roger Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT TO the disproportionate amount of development in one area of the Borough

1. I OBJECT TO the extremely limited consultation period

1. I OBJECT TO the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4380  Respondent: 15366721 / Sylvia Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate amount of development in one area (mainly on green belt)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only
deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4426  Respondent: 15368129 / Sharon Cork  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

1815
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, amongst: turn a largely rural borough into a main urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4469  **Respondent:** 15368513 / Nicola Owens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Comments on Proposed Submission Local Plan

I OBJECT to the propose submission local plan on the following issues

- The increase in house stock by 25% is not supported by the estimates of increased population (+15%)
- Many of the proposed developments are on existing Green Belt land
- The proposed infrastructure is insufficient to support the proposed developments

**POLICY S2: Borough Wide Strategy.**

By adding 13,860 new homes to Guildford Borough Council (GBC) over the 2013-2033 period of the Proposed Submission Local Plan, this represents a net increase of 25% in the housing stock of Guildford Borough and is not justified when the official statisticians at the Office of National Statistics (ONS) are projecting a population increase of about 15% for Guildford Borough over this same period.

I **OBJECT** to policy S2

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4530  **Respondent:** 15368993 / Tessa Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY S2**

I **OBJECT** to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, we are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. On MY community!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4599  Respondent: 15370529 / J Wells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion:

I OBJECT to the 2016 Draft Local Plan
I OBJECT to so many developments in the Send & Ripley area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4607  Respondent: 15370593 / A Gee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact over existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The infrastructure/services in these villages will be unable to cope with the level of development proposed and do not meet the needs of the local communities.

The sites of Wisley Airfield, Garlick's Arch, Send Hill and Tannery Lane are in unsustainable locations. They do not benefit from railway stations that are within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options but to be reliant on motor vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Greater consideration should be given to increasing the density of development in urban areas, such as "brownfield" sites in Guildford, where more practical sustainable transport options are available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4664  **Respondent:** 15371169 / Alison Melville  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object very strongly to Guildford Borough Council’s Draft Local Plan June 2016.

I believe it is inherently unsound and unsustainable due to lack of detail on basic infrastructure.

**Transport:** There is no detail on road networks. The current traffic flow problems in Guildford and surrounding areas are frequent and well documented. Until these are addressed in a sustainable manner it would be completely unsuitable to contemplate any large developments in the area. In particular a solution to the congestion on the A3 needs to be addressed ideally by building a tunnel which potentially could be bored in under a year (at 37 mtrs a day). A lesser alternative would be using 2 x 4 way intersections at Potters Lane, North of Guildford and at the Stoke Road/Ladymead junction. No new roads have been specifically identified in the Plan. It would be completely irresponsible and a waste of money to contemplate building even one house without having access, power & drainage to it assured. Some of the land identified for housing may be key to the development of essential infrastructure so the basics need planning first. Land may be required for a major road intersection etc. The possibility of an unsound decision in building an off slip at Garlick Arch may mean that in the future a 4 way interchange at Potters Lane is unfeasible. This off slip would also make no benefit in relieving the congestion through Burpham. I believe road network decisions, including the A3 will be decided by Highways England in 2020. Without decisions on this vital arterial road, further development within its proximity is unsound and unsustainable.

London Road through Burpham is planned to be a sustainable movement corridor but is likely to be congested by thousands more vehicles trying to negotiate to the South of town. I wonder if this road has ever been visited by the authors of the Draft Plan during a rush hour or when the A3 has one of its frequent hold ups. From the start of the south bound A3 slip road the traffic can often be queueing from around 4pm. Traffic moves at barely walking pace in both directions to and from Guildford town centre. The roundabout along London Road where it intersects with New Inn Lane and Burpham Lane is a particular bottleneck even at weekends. When there is a problem on the A3, Guildford and its surrounding villages often come to a virtual standstill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/4673  **Respondent:** 15371489 / Vivian E. Thomas CBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Over 20,000 responses objected to the 2014 draft Plan. Given that this new plan does not materially deviate from the earlier example I object that this Plan does not address my core concerns in any way. It can be best described as moving the deckchairs around on the SS Titanic and to no positive effect.

Specifically I bring the following points to your attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4675  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the scale of new building throughout the borough which is both disproportionate and unjustified;
- I consider the calculation of housing need is unsubstantiat The model has not been scrutinised and some fundamental assumptions are flawed. The housing target is unconstrained;
- I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion which means that

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4676  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all other sights in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick's Arch, West Horsley and Hog's Back. All are out of proportion to the surrounding area and none qualify to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4678  Respondent: 15371489 / Vivian E. Thomas CBE  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that new sites have been proposed in this consultation which have not been previously considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4680  **Respondent:** 15371489 / Vivian E. Thomas CBE  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I would conclude by saying that were the recommendations to be implemented, if only in a partial sense, it would mark the end of village life as such in a cultural sense and environmental quality. Another words our quality of life would suffer and no government of whatever colour has the mandate to unilaterally impose that on sections of the population. I would conclude by saying that were the recommendations to be implemented, if only in a partial sense, it would mark the end of village life as such in a cultural sense and environmental quality. Another words our quality of life would suffer and no government of whatever colour has the mandate to unilaterally impose that on sections of the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4700  **Respondent:** 15371809 / Susan Pengilly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

With Slyfield Industrial site and large shopping outlet sites on Ladymead Estate is there real proof that further development just a few miles away is needed!

I suggest further consideration of brown field sites or of the Wisley Aerodrome area - this is a large area of underused land that could be better utilised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/4704  **Respondent:** 15372417 / P. Mew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Loca l Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10006  Respondent: 15377473 / Deborah Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4804  Respondent: 15377953 / cctvtraining.com ltd (Gordon Tyerman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

POLICY S2 –Borough Wide Strategy

GROUNDs FOR OBJECTION. 13860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model.
IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4903  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to you to say that I support the objection made by “WAG” and in addition I also support the objections made by Ockham – Ripley – West Horsley – East Horsley parish councils; namely :-

1. The lack of a concise summary of what has changed on this revised Local Plan.
2. 693 houses is far too high
3. Disproportionate density population allocation
4. Broken election manifesto, promise to protect the Green Belt. Councillors lied to the electorate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4907  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. Historic local villages will be ruined by these large disproportionate developments
2. Proposed high density housing out of place in cities let alone these rural locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4915  Respondent: 15380289 / Stephen Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Proposed sites in unsuitable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4918</th>
<th>Respondent:</th>
<th>15380289 / Stephen Hewlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. No planning for local communities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4924</th>
<th>Respondent:</th>
<th>15380289 / Stephen Hewlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Local environment would suffer through future developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/4949</th>
<th>Respondent:</th>
<th>15380289 / Stephen Hewlett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The profits to be made by these greedy offshore developers (Former Wisely Airfield) e.g. will go offshore. Have you not heard of tax avoidance evasion etc.

Tory and Lib Dem Guildford Borough Councillors were, are and will [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri- borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North,

Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data.

There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN isn’t flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4948  Respondent: 15381249 / Helen Poyntz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Section page number 1133 of 1722  Document page number 1834
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4978  Respondent: 15381441 / Gillian Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

5). I object to the Borough Wide Strategy (Policy S2).

The proposal by Guildford Borough Council for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The proposals are for too much development in the north east of the borough (Wisley, Ripley & Send). I understand 36% of all the Plans new housing is proposed in this area, which has only 11% of the existing housing.

Ultimately all this new housing will merge Wisley, Ripley, Send, Glandon all together and they will cease to be villages and become one large urbanisation!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5007  Respondent: 15382529 / Reuben Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

8. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the Guildford Plan Planning Policy (Local Plan Consultation) The huge number of homes proposed takes insufficient account of major transport and infrastructure problems.

How did GBC calculated these figures which conflict with those published by Guildford residence Association? Transparency is essential. Conflicting evidence gathered prior to Brexit (which should also be factored in) shows the figure for new home should be 510 per year from 2013 to 2033.

There are two areas in particular that I would like to focus on:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the Guildford Plan Planning Policy. The large number of homes proposed takes insufficient account of major transport and infrastructure problems. The numbers used are far too. Guildford Borough Council needs explain its calculations used to produce their figures.

I also wish to comment specifically on 2 areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I wish to object to the Guildford Plan Planning Policy for the following reasons:

The is no justification for the large number of homes proposed and the numbers are in conflict with those published by Guildford Residents Association. Guildford Borough Council needs to be open and explain its calculations used to produce figures.

They also take insufficient account of major transport and infrastructure problems.

Two particular areas of concern for me are:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object because GBC have exaggerated the need for the 13,860 house currently in the local plan. A population increase of 20,000 in the plan period would require just 8,000 homes based on 2.5 soles per habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5103</th>
<th>Respondent: 15385281 / Daniel Tarrant</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow Area of the Borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5126</th>
<th>Respondent: 15386017 / Gareth Sinnett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. POLICY S2 Borough Wide Strategy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The housing number is based on preBrexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, halfhour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units,
compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial subcontractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their prodevelopment agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt.
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5145  Respondent: 15386337 / Edna Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt.
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5167</th>
<th>Respondent: 15388385 / Linda Bagnall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ) is Sound? ( ) is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5174</th>
<th>Respondent: 15388641 / Eva Hay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ) is Sound? ( ) is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

- I object to the estimated figure of 13,860 for housing need which is miscalculated and far too high. If this was calculated correctly it would be unnecessary to develop in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The Borough-wide strategy is poorly considered. It proposes 13,860 housing being developed across the Borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else...
can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7. I object to the Borough Wide Strategy (Policy S2)

I object to GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This differs from all the other Borough Councils in Surrey, all of whom are utilising the constraints available to significantly reduce their housing per annum figure. Guildford Borough consists of 89% of Greenbelt land and as such, is entitled to apply significant reduction to its housing allocation. The annual figure of 693 homes is unsustainable without significant and detrimental affect on the current residents of the borough.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area within a 4 mile radius and creating a ribbon effect of 5000 homes in new developments along a short stretch of the A3 from J10 M25 to Burpham. I object to the urbanisation and coalescence of this area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/7934</th>
<th>Respondent:</th>
<th>15388865 / Andrew Powell-Cullingford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Borough Wide Strategy

I object to GBC's proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This differs from all the other Borough Councils in Surrey, all of whom are utilising the constraints available to significantly reduce their housing per annum figure. Guildford Borough consists of 89% of Greenbelt land and as such, is entitled to apply significant reduction to its housing allocation. The annual figure of 693 homes is unsustainable without significant and detrimental affect on the current residents of the borough.

The plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area within a 4 mile radius and creating a ribbon effect of 5000 homes in new developments along a short stretch of the A3 from J10 M25 to Burpham. I object to the urbanisation and coalescence of this area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/7968</th>
<th>Respondent:</th>
<th>15388865 / Andrew Powell-Cullingford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I also object to the enormous cost of both the 2014 Local Plan and the additional expenditure required to draft this 2016 revised version. Certainly the 2016 revised version is no better than the original and in some cases, is significantly worse for many residents. In addition, many residents have spent significant sums of money in establishing various action groups within their local communities, mainly to alert their fellow neighbours and residents about the enormous changes that will go ahead unchecked if we do not collectively oppose the local plan. How can this possibly be a democratic process when GBC have fundamentally failed in their duty to fully consult the residents of the borough?

I object to the GBC aspirations to grow Guildford into a substantially more urban sprawl environment with no regard for the beautiful landscape and historical environment so cherished by people far and wide.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly as it is not representative of how the majority of residents in the Borough wish to see their community develop over the next 15 years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16756  Respondent: 15389025 / Keith Cogan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I also object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will have a massive impact on the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which as I have already mentioned is already well above full capacity. The A3 is already massively gridlocked both northbound onto the M25 and southbound as is passes Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5229  Respondent: 15389089 / R.A. Norfolk  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5232  Respondent: 15389089 / R.A. Norfolk  Agent:
<table>
<thead>
<tr>
<th><strong>Document:</strong></th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
</tr>
</tbody>
</table>

**I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.**

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong></th>
<th>PSLPP16/5249  <strong>Respondent:</strong> 15389121 / M.C. Hollister  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
</tr>
</tbody>
</table>

**I object to the disproportionate disrribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.**

**I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.**

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong></th>
<th>PSLPP16/5255  <strong>Respondent:</strong> 15389185 / M. Patrick  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
</tr>
</tbody>
</table>
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5256</th>
<th>Respondent:</th>
<th>15389185 / M. Patrick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5261</th>
<th>Respondent:</th>
<th>15389217 / B.J. Blair</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/5291  **Respondent:** 15389345 / Peter Reynolds  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilit ies which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/5302  **Respondent:** 15389697 / Oliver Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
London's commuter belt, demand for housing is, in practical terms, unlimited. Accordingly in considering the housing number the Plan should take into account that in this part of elsewhere. The Plan also ignores the point that many of those working in the area live elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. 

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/5339  **Respondent:** 15390337 / Daniel Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. I object to the Borough Wide Strategy (Policy S2)

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/5352  **Respondent:** 15390401 / William Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---
### 1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) I have no doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5384  Respondent: 15390785 / Francesca Molossi-Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a) The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b) The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

c) The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing...
being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5393  Respondent: 15391041 / Anne Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth. °

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5405  Respondent: 15391329 / Marian Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate quantity of proposed development in the Send, Ripley, Wisley, Horsley, Clandon, Merrow area of the Borough.

I see these developments solely as commercial gain for the developers and of no benefit to the existing residents of Send, Ripley and the surrounding area. In fact the level of development Proposed will be detrimental to those of us living here.

I request my objections be shown to the Planning Inspector.

Please take into account my objections when making your decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5412</th>
<th>Respondent:</th>
<th>15391681 / Martin Pope</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5419</th>
<th>Respondent:</th>
<th>15397505 / Andrew Krisson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5426</th>
<th>Respondent:</th>
<th>15397793 / Sheila Collins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country Janes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5435  Respondent: 15397953 / Gillian Dobson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there's too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Glandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5439  Respondent: 15398081 / Jill Pope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5452  Respondent: 15398241 / Paul McNamara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I object to the overall GBC strategy (Policy S2) of building 13,860 homes without any constraints. This differs from all other Borough Councils in Surrey. There is also a clear imbalance in where is being developed. 36% of the development is in the Wisley/Send/Ripley/Clandon area which currently has 11% of the housing. Cynically, I wonder where the people who have decided this live – I’m sure they don’t live in any of the areas most impacted.

Please ensure my objections are taken into consideration and as such the proposals are amended accordingly. Please confirm receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5453  Respondent: 15398497 / G J Masson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to Guildford Borough Council’s Draft Local Plan June 2016 which I consider to be unsound and untenable in its present form.

Constraints should be implemented on development to protect the rural nature of the existing villages as individual villages in their own right and the country lane infrastructure that supports those villages. If not then these proposals will result in a suburban sprawl on the north side of Guildford and the identity of the area and the green belt and rural character will be lost as urbanisation encroaches on this land.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/5466  **Respondent:** 15398657 / Kim Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In
recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPP16/5488  Respondent: 15398721 / J.M. Nokes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object. In the most vehement terms imaginable to the completely unacceptable Draft Local Guildford Plan.

The number of new houses proposed is totally unrealistic for the small country lanes concerned to be able to absorb let alone the appalling amount of additional traffic noise that would be generated.

Why has the number of houses to be built per year been so excessively raised? There is, apparently no reason for this increase so one is forced to conclude that the wishes of the developer for large profit has been put ahead of any thought of social need.

The distribution of houses in the Borough is cockeyed. The North-East has taken an unsustainable number where the lanes are narrow and the volume of traffic at present using through routes causes awful gridlock during rush hours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5490  Respondent: 15398721 / J.M. Nokes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Way the Plan has been drawn up is flawed. Guildford Borough Council's planning consultants have not taken account of Surrey County Council's highway planners views or the costs involved in improving the infrastructure \textit{which} is, anyway, outside their financial capability.

Additionally, no regard has been given to village Neighborhood plans which should have been taken into consideration.

I further object to the 2016 Draft Local Plan as it has given no attention to the number of schools required or any thought about the medical or hospital facilities needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9678  Respondent: 15398817 / Kitewood Estates (Sara Sweeney)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Proposed Submission Local Plan (July 2016) (Regulation 19 consultation) sets out that the council will make provision for 13,860 additional new homes (Policy S2) over the plan period (2013-2033). This equates to an annual figure of 693 dwellings per annum. This is made up of 517 homes, with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability (total 693).

This figure of 693 dwellings per annum is taken from the West Surrey Strategic Housing Market Assessment (SHMA) - Guildford Summary Report (October 2015) prepared by GL Heam (Section 4 - Objectively Assessed Need).

The 2015 SHMA applies household foundation rates from the 2012-based household projections to the 2012-based ONS Sub-National Population Projections to provide the starting point for considering housing need. This approach is fundamentally unsound because further projections have since been published.

Since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2015, mid-2014 and mid-2013. As a minimum, the mid-2014 projections should have been used as the basis for the 2015 SHMA which was prepared in 2015 and published in October 2015, well after the mid-2014 projections were published.

Between both 2013-2014, and 2014-2015, the population of the UK increased by approximately 0.8% overall, year on year. In both time periods, the population growth In the year to mid-2014 and mid-2015 was greatest In southern and eastern England. It can therefore be expected that this will have a significant effect on the household projection rates which would be applied in the SHMA relating to Guildford and the surrounding Housing Market Area.

Overall, the Plan does appear to have been positively prepared. However the OAN will need to revisited before the Plan Is submitted for Examination. The Plan should also build in a contingency for an early review should any of the strategic allocations under deliver or should the neighbouring Local Authorities' Local Plans be delayed or if they are unable to meet their OAN.

We anticipate that, if this analysis were undertaken, the objectively assessed housing need for the Borough Is likely to increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5496   Respondent: 15399041 / Sue Ely   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the Borough Wide Strategy (Policy 52)

   1. The borough wide strategy is poorly con It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?
   1. The Housing number is based on pre-Brexit data for economic and population growth, including migrati These now need to be revised downwards, possibly quite seriously.
1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need".

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/5535  Respondent: 15400161 / Christine Halliday  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My first comment is that the draft Local Plan is not accessible to the majority of residents. As far as I am aware there is no printed book and the files on your website are far too big and numerous to be digested by most members of the general public. Summaries of the Plan should have been produced. If such a document exists please would you send me a copy or advise where I can obtain one.

Having done the best to review the revised draft Plan I think that the scale of development is too great. Too much countryside, which helps to define Guildford as a great place to live, will be sacrificed to housing. It is Green Belt for a reason!

Worse still is the fact that the housing will be bought by people working in London and elsewhere, will not address local needs and will mean that the A3 and trains into London will be ever more congested by people travelling from Guildford to their places of work.

Constraints must be placed on the number of houses built and the land taken up. Proper consideration must be given as to how all the additional people and cars are to move around the Town and Borough. The Town is totally congested and its streets dangerous. Accidents are all too frequent on the Stag Hill section of the A3 while there have been fatal accidents in Bridge Street, North Street and a very serious and unpleasant accident in Lower North Street by the Friary involving 2 small children and their grandparents.

The draft Local Plan must be amended to take account of these concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5538  Respondent: 15400353 / Michael Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 draft Local Plan on a number of grounds, some of which are as follows:-

1. There is no evidence backing the alleged need for new housing on this scale
   1. Where is the provision of new schools and Doctors Surgeries to support this?
   2. I object that proper notice has not been given in respect of some new sites.
   3. I object to the limited consultation period
   4. I object to any erosion of the Green Belt
   5. I object to site A43 Garlicks Arch, which will increase the already chaotic traffic conditions on the Portsmouth Road
   6. I object to site A43a at Clandon, which will only increase traffic conditions
   7. I object to the over development at site A45
   8. I object to the unlawful site A57
   9. I object to the disproportionate amount of development proposed for the Ripley area
   10. I strongly object to any erosion of the Green Belt
12. Road traffic and parking in Ripley is already chaotic, making these proposals unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5539  Respondent: 15400385 / Robert Bonnar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5541  Respondent: 15400385 / Robert Bonnar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5542  Respondent: 15400385 / Robert Bonnar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could...
not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My husband works in the property sector, and his business relies upon development. I am certainly not opposed to the idea of sustainable, reasonable development - but the proposed plan will ruin the Horsleys, destroy the beauty of the surrounding Green Belt and makes no provision for the obvious strains on services and infrastructure that such development would cause.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5608</th>
<th>Respondent:</th>
<th>15400961 / Joan Plumtree</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5609</th>
<th>Respondent:</th>
<th>15400961 / Joan Plumtree</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the local plan as the development proposed is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/5614</th>
<th>Respondent:</th>
<th>15401281 / James Fowler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey Cow1ty Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 20 16 Draft Local Plan as it has had no regard to schools required , additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach.
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a plan that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/5671  **Respondent:** 15406017 / Eleanor Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach.
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is no appetite for the proposals set out in the Local Plan for which will have serious incursions into the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5765  Respondent: 15407393 / Margaret Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is a need for regeneration in some areas and some expansion in social housing especially in urban areas. But this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, which has a disproportionate effect on road traffic.

Therefore I object most strongly as the overall plan is flawed and will lead to the devastation of our villages and our way of life forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5785  Respondent: 15407681 / Emily Holden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5795  Respondent: 15407809 / Valerie Platt  Agent:
I object to the number of new homes proposed for the Borough. By every calculation this target would increase the population of the Borough at a rate higher than at the latest 10 year period as measured by the censuses. Furthermore this figure is totally unsustainable by any measure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5802  Respondent: 15407809 / Valerie Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Fifthly I object to the specific plan relating to my village, West Horsley. It seems utterly incredible that GBC could propose such a plan for a village which is probably the most rural village after East Clandon. Not only is the proposed increase of 385 houses over four sites unbelievable but it is also an increase of 35% which is more than any other location. Whilst I understand that any Neighbourhood Plan has to fit into the Borough Local Plan, a recent survey of the whole village showed that residents felt that only 40 houses were needed [or could be coped with sustainably- no shop, no Post Office, difficult parking in East Horsley, railway station parking at capacity and limited Bus Service] in the same period. Even allowing for the GBC needs, this shows just how distorted the numbers are in Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5882  Respondent: 15408513 / Brian Rawling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present there three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are
being allocated between the M25 and Burpham, a distance of only 5 miles. It will in effect create a sprawl, with the merging of 'identities' of the surrounding villages, with no delineation between one village and the next.

The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. This development will have a permanent and detrimental impact on each of these communities, should this Plan be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5828</th>
<th>Respondent: 15408609 / John Perrot</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object most strongly to the proposed development at Garlick Arch, Wisley Airfield, Gosden Hill and Clandon Golf course. These large developments will have a profound effect on the Cladons and surrounding villages and countryside. The traffic situation locally is impossible already and will become much greater if any of this proposed development goes ahead. The Cladons and other small villages will just merger and become a suburb of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16719</th>
<th>Respondent: 15411457 / Emily Beynon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to object to the proposal made in the current Proposed Local Plan to build hundreds of new houses in the green belt village of West Horsley.

Agreed, there is a need to create more small, affordable homes in the borough, however proposing an increase of some 50% in the number of properties in this small rural village seems, if I may say so, to border on madness! Surely a far better solution (or rather multiple smaller-scale solutions) could be sought on brown field sites or in the conversion of abandoned commercial properties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16724 | Respondent: 15411873 / Roger Alford | Agent: |
I am alarmed by what I have read about the plan for the prospective development of Guildford. The scale is surprising and the failure of GBC to apply any constraints to housing numbers (like other councils) is hard to understand. The prospective worsening of traffic problems in the town (where the new Waitrose has already made the traffic in York Road slower and more congested) is particularly worrying.

It is hard to understand why our council has opted for change on a scale which appears to be directly to the disadvantage of existing residents. This whole plan needs to be looked at again. We need a sensitive and measured approach to Guildford’s future development, not over-ambitious gigantism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I would suggest the Local Plan is not sustainable

The Local Plan is driven by greed. the Borough Council wanting to develop more businesses to obtain more money.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haselmere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live...
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford has been a desirable place to live and residents are entitled to want to keep it that way. Organic growth is natural and expected, but an increase of about a third in the population in a short time will almost certainly have a strong negative impact on the character of Guildford. Please think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16831  Respondent: 15421633 / Julia Cogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that we are given an exaggerated “housing need” figure of 13,860 and that 70% is targeted at the Green Belt – the housing need figure has been wrongly calculated and wrongly apportioned to our area and, also, the housing need for students wrongly assessed – we must not use our Green Belt, but use our urban land better, finding better ways to provide affordable housing and for additional student accommodation we should concentrated on existing areas of the University of Surrey’s campuses where there is much unused land and large areas of surface parking.

I object to the housing numbers that are proposed in our locality (including the 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm) - they are not only far too large for an area that does not have sufficient infrastructure but they will totally destroy the Green belt and large areas of agricultural land. These enormous areas of development will completely change the nature of the environment over a huge area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6040  Respondent: 15422145 / Orlando Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I OBJECT to the Borough Wide Strategy (Policy S2)
2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been
used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16846  Respondent: 15422145 / Orlando Lee  Agent:  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build...
homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Borough Wide Strategy.

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to moderate the overall housing figure, as would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including mi These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half of those who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is also outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014, but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted within the Plan is also out of balance. There is disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are proposed between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a huge impact on the surrounding local villages and will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6194</th>
<th>Respondent: 15424865 / Robert Victor Ewen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. There is a lack of transparency in the underlying assessment of needs which is completely unacceptable. The effects on traffic would be woeful and a suitable solution is not apparent in the plan.

I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6152</th>
<th>Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Objection to the Guildford 2016 Local Plan

East Clandon Parish Council objects to the 2016 Draft Local Plan as a whole and in particular we object to the specific issues (listed below). We believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

Our specific points are:

1. We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/858  Respondent: 15425665 / East Clandon Parish Council (Alyson Blackwell) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation with us. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, we object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis on providing retail and commercial in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, we object to Policy S2 because we believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and we feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

We object to the fact that in Policy S2, despite the afore mentioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Policy S2 – Borough Wide Strategy**

I object to this policy.

1. The OAN (adopted as the housing number) lies at the heart of the Plan. This number is now unsupportable (if it ever was) following the referendum.

2. The OAN can only be considered “deliverable” because the Council has failed to consider the protection afforded to the Green Belt in the NPPF, ministerial statements and local and national Conservative Party manifesto commitments.

3. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important. The Plan itself appears to recognize that infrastructure and other constraints may affect deliverability. It is unlikely that the number of houses can be built at the rate proposed.

1. Guildford is part of London’s commuter belt and the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. The Plan will not significantly reduce prices or increase affordability except at the margins.

1. The Council has not taken account of constraints to development from the Green Belt and infrastructure. This approach differs from the other boroughs in S. The Plan is based on the assumption that “growth is good” and therefore “sustainable”. More consumption, more congestion, more Green Belt being taken is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. The edge of urban Guildford will be moved much closer to West Clandon. It will be built on Green Belt land which was to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

**What changes (2016)/ further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID: PSLPP16/6421  Respondent: 15426305 / I C Dean  Agent:***

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

---

**Comment ID: PSLPP16/6195  Respondent: 15426337 / C Cope  Agent:***

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the Borough Wide Strategy (Policy S2)

It is clear that this is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a merging of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I OBJECT** to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6242</th>
<th>Respondent: 15426657 / Jean Birkby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ) , is Sound? ( ) , is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6245</th>
<th>Respondent: 15426721 / S Mayersbeth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ) , is Sound? ( ) , is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6249</th>
<th>Respondent: 15427489 / Andrew Isherwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ) , is Sound? ( ) , is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Having reviewed the local plan I fear that it is poorly conceived and based upon weak/flawed data.
I do support the response from the Guildford Residents Association.
I oppose the expansion of Guildford by 35%.
Insufficient consideration has been taken of brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/649  Respondent: 15427489 / Andrew Isherwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of flawed evidence, Guildford's proposal for more than 12,426 homes is excessive and will result in needless loss of Green Belt and character. It will also result in increased congestion that cannot be justified in our heavily constrained borough.

Population estimates and growth estimates are over-inflated

Congestion is severe and requires step-change remedial action before any further housing is approved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6252  Respondent: 15427617 / Ken Scotland  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

My main objections to the Local Plan are on the grounds of the large increase in traffic that is bound to ensue through the village of West Clandon, and to object also because of the consequent destruction of Green Belt lands. The detailed comments below on the paragraphs within the Local Plan have been prepared by others, but nevertheless accurately and succinctly reflect my own views, and are therefore largely unaltered.

Traffic in West Clandon is significant in off-peak times, and becomes congested for most of the peak- traffic times, with frequent tail-backs from the Clandon Road/Portsmouth Road roundabout (A246/B2215) to the West Clandon/Guildford Road cross-roads (A246/A247). As the present Clandon Road (A247) cannot cope with peak traffic demands, and any significant improvement in traffic handling on that road would require many houses in the village to be removed and house frontages drastically reduced, so any proposed significant increase in traffic would appear to be the result of inadequate or negligent planning. You will be aware that as recently as 12.07.16 there was yet another traffic accident in the village, this time involving two cars. As a pedestrian walking on the narrow pavements (which are sited on only one
side of the road, there being insufficient space for pavements on both sides) I frequently see vehicle debris lying at the road side, presumably as a result of vehicles side-swiping one another on the narrow road. I also not unusually have to have my car mount the pavement in order to pass on-coming wide vehicles (or for them to have to do so).

You should also be aware that traffic congestion in Guildford usually results in congestion on the A3 and A246 leading into Guildford, which then causes severe congestion on the A247 through West Clandon, presumably as traffic on the other two routes tries to find alternative routes. The proposed housing developments in the Gosden Hill and Garlick Arch areas would only result in grid-lock through the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6257</th>
<th>Respondent:</th>
<th>15427617 / Ken Scotland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite substantially.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the Strategic Housing Market Assessment (SHMA) and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
The Plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the Borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% Area of Outstanding Natural Beauty (AONB) and about 75% protected by Special Protection Area (SPA)). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number, the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been skewed towards growth without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites, and through increasing the housing density of existing built-up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a
merging of identities of the surrounding villages. The Plan is therefore unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6272  Respondent: 15427745 / Barry Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan does not offer any constraints to protect the character on Guildford, which is already very congested. Other boroughs within the area are applying constraints to overall housing growth - Guildford is not. The Plan does not acknowledge the 'identities' of villages threatened by the proposals which includes Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6297  Respondent: 15427937 / Elizabeth Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I Object;

To the new Burnt Common interchange to A3 for 2000 Wisley houses, 2000 houses at Gosden Hill and 1850 houses at Blackwell Farm. Is there really the need to build so many house in one small area, could these houses not be divided up and built a few in many other areas to avoid congestion through Send. We often have traffic issues and many mothers walk to school at present with many small children which would make this trip quite dangerous for them, so much traffic for so many houses. This is a small Village, what impact will this make on local services i.e. Doctors Surgery, Guildford and St Peters Hospitals (which are already stretched beyond belief), Police Force, Council Services (who have already cut down collection times) Street maintainance (already our roads are in a poor state of repair)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6290  Respondent: 15427969 / Chris Mealing  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**I object to the Borough Wide Strategy (Policy S2)**

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/6361  **Respondent:** 15428289 / Vicki Donnelly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The answer surely is for new towns, which could cope with expansion to build the houses needed? Now would be a temporary measure.

Families Grow and then where do they go? Let us keep the Green Belt and create fresh towns. I object to losing it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/6369  **Respondent:** 15430113 / N Cook  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Families Grow and then where do they go? Let us keep the Green Belt and create fresh towns. I object to losing it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object most strongly to the proposed development at Garlick Arch, Wisley Airfield, Gosden Hill and Clandon Golf course. These large developments will have a profound effect on the Clandons and surrounding villages and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6372  **Respondent:** 15430241 / Tina Grace  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please reconsider your proposal for 450+ new homes in West Horsley and take a more measured approach in line with feedback expressed by the existing residents. The people of West Horsley are not being unreasonable. We understand that some increase in housing stock is needed, as current residents wish to stay in the village and new people wish to join our community. However, to increase the population of West Horsley by the numbers of people and cars you propose would destroy the character and effective functioning of the village for both existing and future residents.

I sincerely hope that you reconsider your proposal and that we can arrive at numbers which the West Horsley residents can embrace as a positive outcome for an organically evolving village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6377  **Respondent:** 15430305 / Moira Griffin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the concentration of development in the North of the Borough, aimed at appeasing developers, maximising their profits and benefitting an overspill population from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6414  **Respondent:** 15430369 / Sarah Long  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6415  **Respondent:** 15430433 / Simon Greenhill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

---

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6419  **Respondent:** 15430497 / Martin Chalk  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

---

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/6421  **Respondent:** 15430945 / Rosalind Molesworth  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

---

I am writing to object to the proposed plan affecting the Send and Send Marsh Areas:

I object to the local plan A44 as this would have an adverse impact on street parking.

Plans A42, A43 and A44: The village of Send and Send March have limited access, and no public transport which can be relied on for travel to employment. Therefore the creation of new homes within these areas will dramatically affect the already congested road network. It is noted that under the plan A43A there are new slip roads for the A3, and this is
supported, however this will not by anyway relive the existing problem. The fact is during the rush hour periods and frequently on the weekends the A3 is congested from around the BP services to the M25. All new homes will still be served by the existing North bound slip at Ripley as it will take commuters closer to the M25. In fact it may encourage more of the existing A3 north bound traffic to travel through the over used village roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6476  **Respondent:** 15433377 / Peter Robinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

There seems to be no justification for the size of the increase in the overall housing numbers detailed in the plan which are almost 70% above official national estimates for population growth in the Borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6480  **Respondent:** 15433505 / Hugh Grear  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )* 

Objections to Guildford Borough Council Proposed Local Plan (June 2016) I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt land. Election manifesto promises to the electorate are being broken.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. It also fails to take into account the new situation due to Brexit, a fact which makes the draft Local Plan now appear hopelessly out of date.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6481  **Respondent:** 15433569 / Jennifer Beddoes  **Agent:**
I am a resident of Send Village and would like to express my concerns regarding the proposed development contained in the above plan.

I feel strongly that the development of villages is best achieved via the Neighbourhood Plan process which allows residents to determine an organic growth for any additional housing according to the needs of the village.

I therefore object to Guildford Borough Council determining the rise in the annual number of houses to be built each year: it would appear that the projected number of houses to be built has been overestimated by 30% which must surely be put down to financial gain rather than social need. This is a totally unrealistic number of houses for narrow country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6554</th>
<th>Respondent: 15434145 / Christine Townsend</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I support the GRA response to the local plan, and strongly oppose the expansion of Guildford by a quarter.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6559</th>
<th>Respondent: 15434209 / Brian David</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>In the meantime Guildford Town centre has great capacity for residential development in the hideous and dirty car parks around the cinema for example. I went there when the cinema in Esher was being refurbished and had the worst cinematic evening out in my life. To have a drink before the film we crossed a three lane road to the nearest hostelry on an earsplitting roundabout, and the pub floor literally squelched with spilt alcohol and stank. I was embarrassed to have brought foreign guests to the “City” of Guildford which seemed as poor and shabby as a Third World country. North Street is like Belfast in the 1970’s. Spend our money on smartening up your town before you concrete over our Green Belt !</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6563</th>
<th>Respondent: 15434241 / Valerie Sowerby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The inflated number of new houses would result in an alarming increase in in the number of Horsley residents way [an estimated 35%] in an area with an already overstretched infrastructure</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and why were Councillors not allowed to scrutinise it? The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough with too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]).

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will result in urbanisation and an inevitable merging of the current the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6585  **Respondent:** 15434433 / James Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6593  **Respondent:** 15434529 / Kate lloyd  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The inflated number of new houses would result in an alarming increase in the number of Horsley residents way [an estimated 35%] in an area with an already overstretched infrastructure.

I sincerely hope my objections will be duly noted.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13296  Respondent: 15434817 / Peta Hayden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the UNSUSTAINABLE, based on FLAWED DATA draft Local plan june 2016

I support the Guildfords Residents Association response and am opposed to Guildford expanding by a quarter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6618  Respondent: 15434881 / M G Waugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Council’s failure to unlock the development potential of brownfield sites in the Borough and the volume of currently unoccupied residential properties in the Borough should be given a greater priority in the search for developable land before ruining the environment, livelihood and well-being of a unique area of Britain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6667  Respondent: 15435489 / Linzi Spence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing this letter as I am very worried about the proposed Guildford plan. I have lived in Guildford for nearly 40 years and in that time have noticed how the traffic situation has become a nightmare. The consequences of the expansion of Guildford by a worker would be catastrophic. I therefore really oppose the expansion. It is unacceptable that Guildford is choosing not to constrain its overall housing growth. It will generate so much extra traffic congestion.

Transport evidence is not yet fit for use. The plan is not ready for an inspector.

I totally support Guildford residents association. Please reconsider as once these mistakes are made Guildford will never be the same.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6742  Respondent: 15437729 / Terry Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I live in Heath View East Horsley and although for reasons best known to the boundary dept I am technically in the parish of Effingham, I am very much a Horsley person having lived and participated in the village for the past 65 years.

The planned development sites will ruin the village. The wider infrastructure of roads, drains, schools and medical facilities will be completely inadequate. These issues are only addressed by a few short sentences in the a 250+ page report giving the strong impression the council does not care about the impact and consequences on the lives of the people already in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6743  Respondent: 15437889 / Janet Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Planning for our borough – our spatial development strategy I object to the proposed SHMA figures. I support the submission by Guildford Residents’ Associations which challenges the figure of 693 houses per annum. The reports commissioned by GRA and others prove that the methodology used has been deliberately withheld from public scrutiny and seems to be flawed and that such a high level of housing is not justified, particularly in the light of the recent economic and political situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount of development in one area of the It is noteworthy that the proposed number of additional homes for the total of Guildford Town Centre, Guildford Urban Area and Land Around Guildford Urban Area amounts to 35% of the overall total in the 2016 Draft local Plan (with a decrease of 1356 or over 16% from the 2014 Plan, whilst the total for the area within just 3 miles of Send Marsh amounts to almost 40% of the total (and the total number in Villages increases by over 500 or 24%).

I object to site A43 Garlick's Arch, to the building of 400 houses and 7000 sq m of industrial space. The site floods and is of ancient woodlands. The industrial space is unnecessary. If any is needed, it should be at Slyfield. There is a lack of evidence for the alleged housing need numbers, and local services are inadequate to cope with increased population.

I object to the last-minute inclusion of new sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as a whole as it is, to me, totally wrong for the Council to sub-contract a large part of the Draft Local Plan work to a private company which in the main works for developers and so suggests the possibility of a strong conflict of interest.

I object to the Draft Local Plan as a whole as I believe that it is not sustainable. For example, no railway station within easy walking distance of Wisley airfield and Garlick's Arch, poor bus services which are proposed to be reduced, lack of utility infrastructure at Garlick's Arch.

I object to the Borough Wide Strategy especially as Wisley airfield, Garlick's Arch and Gosden Hill Farm will have a disproportionate impact on local villages.

I object to the Draft Local Plan as a whole as I believe that it is untenable.

I object to the Draft Local Plan as a whole as I believe that it is unworkable.

I object to the Local Plan as a whole as I understand that the GBC Transport Strategy Document had not been published when the revised Draft Local Plan Public Consultation began on 61 June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6883</th>
<th>Respondent:</th>
<th>15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Draft Local Plan as a whole as I do not believe that the number of new homes included as being required is justified or

1. I object to the inclusion of Site Policy A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh,- Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill,Send, A45 Land at the rear of the Talbot, High Street, Ripley and A57 The Paddocks, Rose Lane, Ripley as there is insufficient local infrastructure to support an additional 507 families, (Policy I1) especially in respect of:

1. Healthcare facilities
1. Schools
1. Policing
1. Social Welfare
1. Shops and restaurants
1. Parking facilities
1. Safe local roads
1. Cycle Lanes
1. Pedestrian footpaths

which would be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6913  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan, especially the inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill,Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together all the extra building on these sites would considerably increase flood risk in the areas concerned, whilst nothing appears to be done to resolve existing recurring flood problems such as Ockham Road off the A3/0ckham roundabout and the B2215 towards Ripley, both of which flood with alarming regularity.

There is also a risk of additional flooding at the entry to the site by Garlick's Arch where there are a number of existing businesses, between Kiln Lane and Burntcommon Lane junctions. This is because there is a build up of tree debris at the point where the stream enters 3 pipes under Portsmouth Road which, if left unchecked, could form a dam similar to that at the junction of Portsmouth Road and Send Marsh Road which resulted in flooding of numerous houses in Maple Road and Send Marsh Road some years ago.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6918  Respondent: 15438049 / David A Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan because the overall impact of sites A35 Wisley former airfield, A43 Garlick's Arch and A25 Gosden Hill Farm, when added to existing residential areas in between, will turn the local villages into a huge suburb and lead to a form of almost continuous Ribbon Development from the M25 to GBC seems to be headingthis way with its DRAFT Local Plan, Green Belt insetting policy and Aspirational Road development ASP3.

Ribbon Development should be a thing of the past, not the present and future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10640  Respondent: 15438049 / David A Sprigings  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the local Plan as a whole and to the numerous proposals to undermine the Green Belt in various areas of the Borough. This is because the lead party in Guildford Borough Council, Conservative, campaigned for election on their policy of protecting the Green Belt for Guildford Borough residents I believe, therefore, that the Council does not have a mandate for its policy of significant undermining of the Green Belt in the Borough, including insiting of numerous villages such as Ripley, Send and Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10647</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Local Plan as a whole as it is, to me, totally wrong for the Council to sub-contract a large part of the Draft Local Plan work to a private company which in the main works for developers and so suggests the possibility of a strong conflict of interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10654</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

1. I object to the Borough Wide Strategy (Policy S2) especially as Wisley airfield, Garlick's Arch and Gosden Hill Farm will have a disproportionate impact on local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10657</th>
<th>Respondent: 15438049 / David A Sprigings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the Draft Local Plan as a whole as I believe that it is
   unworkable.

1. I object to the Draft Local Plan as a whole as I believe that the proposed scale of housing development is
   excessive.

1. I object to the Local Plan as a whole as I understand that the GBC Transport Strategy Document had not been
   published when the revised Draft Local Plan Public Consultation began on 6th June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10669  Respondent: 15438049 / David A Sprigings  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the Local Plan as a whole as I cannot support it when the Leader of the Council says (as he did at the Council
meeting on 24/5/2016) that "given the size of this beast there is no way it is 100% correct". Whilst Councillor Spooner
evidently thinks it is acceptable for the Local Plan to contain errors I and, I am sure, many residents of the Borough, do
not agree, especially when those errors are errors of fact or contradictions of other statements in the plan or its supporting
documentation. Some examples from documents on the Council website supporting the draft local plan, relating to areas
close to my home (I haven't looked at other areas) are:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10672  Respondent: 15438049 / David A Sprigings  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the Draft Local Plan as a whole as I do not believe that the number of new homes included as being required is
justified or

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10676  Respondent: 15438049 / David A Sprigings  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
I object to inclusion of Site Policies A25 Gosden Hill Farm, Merrow Lane, A35 Land at former Wisley airfield Ockham, A42 Clockbarn Nursery, Tannery Lane, Send, A43 Land at Garlick's Arch Send Marsh, Burntcommon and Ripley, A44 Land west of Winds Ridge and Send Hill, Send, A45 Land at the rear of the Talbot, High Street, Ripley, A57 The Paddocks, Rose Lane, Ripley and the numerous Site Policies in East and West Horsley as together these would add more than 5000 new homes and probably 1000 cars to an area within 3 miles of Send Marsh which, at almost 40% of the number of additional homes in the revised Draft Local Plan, is wholly disproportionate to such a small area of local villages and their surrounds. (Policy S2) It is noteworthy that the proposed number of additional homes for the total of Guildford Town Centre, Guildford Urban Area and Land Around Guildford Urban Area in the 2016 Draft Local Plan has fallen by 1356 or over 16% from the 2014 Plan, whilst the total additional homes for the small area within just 3 miles of Send Marsh exceeds 5000 and amounts to almost 40% of the total Plan. The total for Villages in the Plan has increased by more than 500 or 32%. There should be more development in urban areas and brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to POLICY S2 –Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wholly object to the volume of housing that is being planned, I fear the village does not have the infrastructure to support such development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6811  Respondent: 15439425 / Abigail Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Proposed Submission Local Plan June 2016. The plan is not fit for purpose and unsustainable.

Please find my objection listed below to specific policies and matters within the Plan

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6882  Respondent: 15440065 / R Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
My wife and I came to the Horsleys in the early 80s. We have stayed because everything gives a good and enjoyable way of life. More houses and in the numbers proposed could be cruel and only sanctioned by someone not living here.

I hope you find these few words helpful when deliberating our future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6897  Respondent: 15440513 / Alexandra Gordon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6902  Respondent: 15440545 / Susan Wright  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the Guildford Borough Council,s Draft Local Plan June 2016 for the following reasons:-

There are no constraints to protect the character of the rural aspects of Guildford or its villages.

The vast planned development of homes is a disproportionate level of expansion making it unsustainable without the necessary infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6908  Respondent: 15440609 / S Trower  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing to express my objections to the Local Plan that threatens to destroy the identity of our villages, zone vast areas of Green Belt land for development and make all the roads in the area permanently congested.

I wish to register my OBJECTIONS to:

1) The number of homes (693p.a.) that the Plan intends to deliver

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is much use of the word sustainable in the local plan. A dictionary definition is “which conserves an ecological balance by avoiding depletion of natural resources or that can be sustained” Once green belt land is built upon, how it can be sustained? The truth is it can’t – once the green belt is gone that is it – it will never be replaced. The recent referendum vote for Brexit from the EU must cast doubt on many of the assumptions made for population and employment forecasts. The consultation appears to be based on figures which have been kept secret from the public, so how can there be any transparency in the whole process?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6923  Respondent: 15440705 / Jane Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In addition to all of the above the volume of new housing proposed for the Horsleys and surrounding villages including the proposal for Wisley airfield does not only seem inappropriate, unjustified and necessary but also seems to be well above the national estimates for population growth. to be unnecessary. Why is this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6924  Respondent: 15440833 / Rhoda Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

With regard to the sites numbered:

- A25 – Gosden Hill
- A43 and A43a - Land at Burnt Common – known as Garlick's Arch
- A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.

   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.

6. Other infrastructure.
   Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

7. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society. It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.
   It seems difficult to reconcile these two extreme positions.
   If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
the housing proposed in the local plan doubles the size of Burpham - this is not acceptable to the local community S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6985  Respondent: 15442049 / Ellouise Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or...
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7090</th>
<th>Respondent: 15442561 / Tegan Meredith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all building on the Green Belt at Send, Ripley and Clandon because any called for development can be accommodated in Guildford’s brownfield areas much closer to existing transport facilities.

I object to the quoted housing need amount of 13,860 for the borough which is far too high.

I object to expanding Send’s housing by over 25%. Objections were raised before and the number was reduced to from 435 to 185. It does not make any sense and goes against many people’s wishes to expand on this number once again.

I would like my objections to be noted and the draft Local Plan (June 2016) amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7113</th>
<th>Respondent: 15442721 / Elizabeth Robson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the borough wide strategy because:

- There is insufficient justification to build over thirteen thousand homes.
- Lack of transparency in housing requirement projections
- Absence of exploration of brown field options
- Based on out of date assumptions ie pre Brexit
- The proposed development exceeds local demand and instead will satisfy demand from neighbouring and other boroughs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7113</th>
<th>Respondent: 15442753 / Anne Morgan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- **number of new houses** - the density of new houses (double that approved in the 2003 local plan) is out of proportion to what the local amenities can manage.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7129  **Respondent:** 15442913 / Inger Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

My main objections to the Local Plan are on the grounds of the large increase in traffic that is bound to ensue through the village of West Clandon, and to object also because of the consequent destruction of Green Belt lands. The detailed comments below on the paragraphs within the Local Plan have been prepared by others, but nevertheless accurately and succinctly reflect my own views, and are therefore largely unaltered.

Traffic in West Clandon is significant in off-peak times, and becomes congested for most of the peak-traffic times, with frequent tail-backs from the Clandon Road/Portsmouth Road roundabout (A246/B2215) to the West Clandon/Guildford Road cross-roads (A246/A247). As the present Clandon Road (A247) cannot cope with peak traffic demands, and any significant improvement in traffic handling on that road would require many houses in the village to be removed and house frontages drastically reduced, so any proposed significant increase in traffic would appear to be the result of inadequate or negligent planning. You will be aware that as recently as 12.07.16 there was yet another traffic accident in the village, this time involving two cars. As a pedestrian walking on the narrow pavements (which are sited on only one side of the road, there being insufficient space for pavements on both sides) I frequently see vehicle debris lying at the road side, presumably as a result of vehicles side-swiping one another on the narrow road. I also not unusually have to have my car mount the pavement in order to pass on-coming wide vehicles (or for them to have to do so).

You should also be aware that traffic congestion in Guildford usually results in congestion on the A3 and A246 leading into Guildford, which then causes severe congestion on the A247 through West Clandon, presumably as traffic on the other two routes tries to find alternative routes. The proposed housing developments in the Gosden Hill and Garlick Arch areas would only result in grid-lock through the village.

West Clandon and the villages and amenity areas around it constitute at present pleasant and peaceful semi-rural habitation. The proposed housing changes would evidently change all of that, resulting in a quasi-urban environment which is not what the local peoples wish for. I understand that there may be a need for increased housing, but would question whether that should be done at the cost of destroying much of the quality of life of existing residents. There are other areas where such developments could be done without such consequences.

My detailed objections are listed below.

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016). In my opinion the Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite substantially.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the Strategic Housing Market Assessment (SHMA) and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s Objectively Assessed Needs (OAN) is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints...
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The Plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the Borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% Area of Outstanding Natural Beauty (AONB) and about 75% protected by Special Protection Area (SPA)). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number, the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been skewed towards growth without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites, and through increasing the housing density of existing built-up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is therefore unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/7188  **Respondent:** 15443361 / G Martin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Object

Over 80% of Guildford borough land is situated in the Green Belt and the Proposed Submission Local Plan (LP) housing numbers fail to take into account allowable constraints on new builds in the borough, caused by the green belt. Due to such a high housing target, over the plan period, the only way such large housing numbers can be accommodated is by taking too much land out of the Green Belt. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints based on the high proportion of Green Belt in the borough. Effingham Parish Council objects to the housing target - it is too high.

In addition, it is necessary to review the Strategic Housing Market Availability Assessment (SHMAA) concerning:

1. The part of the housing target driven by economic growth. Is this housing target still appropriate for the borough following the referendum result and the expected slower growth in the future? Given that an average of 125 new builds per year are due to economic growth this figure needs reviewing.

1. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fees. Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.

1. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/7193  **Respondent:** 15445665 / Jonathan Hewlett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
5) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7219  Respondent: 15445793 / Jackie Withers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7248  Respondent: 15446145 / Nigel & Jane Simpson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We, Nigel and Jane Simpson of the above address, object to the 2016 draft Local Plan as a whole and, in particular. We object to the specific issues listed below. We believe that this Local Plan is severely flawed and will have a direct and serious detrimental effect on the amenity currently enjoyed by ourselves and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. The proposals in the Plan will seriously erode the openness of the greenbelt and endanger the beauty and views in and out of the Surrey Hills Area of Natural Beauty.

Our specific objections are:

We object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes and we object on two grounds:

The proposed housing numbers have been imposed on us with no proper consultation being undertaken with the residents of East Clandon and the Borough as a whole. Secondly, the housing numbers are based on a high growth economic development plan which in itself has had no consultation with us and this. Combined with estimated demand from London residents, will turn Guildford into a dormitory town for London.

Further, we object to the fact that no real economic or housing demand factors have been provided by the Borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF's requirements for the Planning Authority to provide meaningful consultation.

1. We object to the fact that Guildford Borough Council have not met the requirements of the NPPF paragraph 155, which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by Guildford Borough Council. We have not had a meaningful consultation on imposing a settlement boundary 0 11 East Clandon. There is also the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

We demand that there should be a significant challenge to the Guildford Borough Council scenario including planning, housing and growth numbers, which should be revised and especially in the light of uncertainty and changes which will accompany Britain 's withdrawal from the European Union.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7255  Respondent: 15446305 / Mo Adda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
disproportionate level of development in the area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7260  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14357  Respondent: 15446401 / Louise Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY:
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7268  Respondent: 15446433 / Gavin knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7280</th>
<th>Respondent: 15446753 / David Boyce</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to the amount of houses which are being planned, I understand that additional houses have to be built but the quantity that are being planned in our area is unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7341</th>
<th>Respondent: 15448193 / B. A. Howell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

2. **I object to the Borough Wide Strategy (Policy S2)**

The borough wide strategy has been ill considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey and suggests a very irresponsible and cavalier approach has been implemented and this will need examined in detail to understand how this could have happened.

It is clear that the strategy adopted in the Plan is out of balance, and disproportionate with development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will significantly impact on the surrounding local villages. They will have a permanent detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
On the Plan specific, I object to policy S1, S2; sustainability and disproportionality. None of the proposed major strategic sites are really feasible as communities, the costs involved developing them will be borne out on neighbouring established communities, such as Ripley, Send, Ockham Hatchford et al. There are no infrastructure improvements planned, it is assumed that thousands of vehicles can be accommodated by the existing roads; they clearly can't as roads are near gridlock at times now; eg Ripley High St. Many of the existing roads are not able to be expanded, even if that were possible, it is not desirable as it only accommodates unbridled growth of extra traffic, exacerbating a current major problem (policy I1). No proper improvements appear to be planned to sewage systems, medical services electrical supplies Bus or rail services Rail is limited and vehicles are always needed to get to a station miles away, Bus services are actually closing; e.g. Routes 462, 463.

The density and numbers of the proposed houses are skewed towards the north of the Borough. The 5,000 proposed between Burpham and the M25 will represent the worst example of ribbon development. The north of the Borough could end up one vast urban sprawl, stretching from Cobham to Guildford. No critical plan has been described at any stage of the 'consultation' in regard to the method for actually building these estates. They just seem to be expected to evolve seemlessly over a number of years. That clearly is a nonsense, the surrounding areas will subjected to unbridled industrial activity, making day to day life miserabale; why should residents have to put up with that for years.

I object to policies I2, I3: the proposed Three Farms Meadow and Garlick's Arch site will need considerable alterations for Trunk road access; who will pay for this? It seems that the question is just assumed away, it will happen to allow the developers to build. If that assumption is based on the ordinary tax payer funding road improvements, then it is high objectionable; why should any one allow tax payers money to subsidise private development profit when they object to the whole Plan in the first place. Either way the situation on the A3 and M25 is one of total congestion at key times; the A3 is congested between Guildford and Cobham, most all the time; how do the authorities think that thousands more vehicles are going to be accommodated?

With air quality breaking the limits set for healthy habitation, the pollution levels, Nitrous oxide, Beznies etc, will undoubtedly rise to totally illegal standards. The situation in the north of the Borough is already extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7364  Respondent: 15448353 / Emily Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7365</th>
<th>Respondent: 15448385 / Edward Bates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Surrey Sports Park is an important facility in Guildford which provides not only sport and physical activity provision for students but also is the base for the Harlequins Premier league rugby team. It provides public access for over 80 community clubs for a variety of sporting activities, it attracts members of the community that are interested in well being and attaining higher levels of fitness and is an important venue for major sporting events which deliver significant economic impact to Guildford. We provide high levels of community engagement with disadvantaged people in the area through our schools and community liaison work and our outreach programmes, which are particularly targeted at young people, and delivered through our professional sportsmen and women paying in our three sport franchises: SurreyStorm, Surrey Scorchers and Surrey Smashers.

I understand that the draft plan for the period 2013 to 2033 is out for public consultation.

From the perspective of the Surrey Sports Park I am writing to support the policies which will:

- Assist in recruitment and retention of staff by providing wider access and choice of housing, particularly where this is within walking distance from our centre
- Provide better access to the West from our location at Manor Park by investing in Infrastructure.

I understand that to provide these benefits there will be a need to redraw the greenbelt boundary to provide for these important policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7367  Respondent: 15448449 / Carol Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived.
from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/7505</th>
<th>Respondent:</th>
<th>15449473 / Liz Markwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/7515</th>
<th>Respondent:</th>
<th>15449857 / Fiona Cumberland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/7523</td>
<td>Respondent: 15449889 / Harriet Bell</td>
<td>Agent:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------------------</td>
<td>--------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7608</th>
<th>Respondent: 15450785 / Georgina Love</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The councils proposal to include such a large increase in housing differs from all the other Borough Councils in Surrey and is unbalanced across the borough with too much proposed to the NE of the borough (Wisley/Ripley/Send and Clandon). This seems out of proportion and peculiar particularly as this is Green Belt land.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7618</th>
<th>Respondent: 15450817 / Audrey Gachen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to POLICY S2 –Borough Wide Strategy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7661  Respondent: 15450945 / Sarah Kennedy Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Whilst I acknowledge that the Borough needs identify further sites on which affordable housing can be built, I believe that the proposal to build some 400+ homes in West Horsley is ill-conceived and totally disproportionate to the existing housing stock of some 1,100 homes.

West Horsley does need some affordable housing, but this can be achievable both sensitively, and without comprising the Green Belt status and the protection that it offers. Implementation of the Local Plan proposal for West Horsley will remove that protection and will irreversibly alter the character and nature of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7678  Respondent: 15451009 / Michael Love  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)
The council’s proposal to include such a large increase in housing differs from all the other Borough Councils in Surrey and is unbalanced across the borough with too much proposed to the north east of the borough (Wisley/Ripley/Send and Clandon). This seems out of proportion and peculiar particularly as this is Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7687  Respondent: 15451041 / Iain Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7697  Respondent: 15451457 / Camilla Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7715  Respondent: 15451713 / Gaby Attwood  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7729</th>
<th>Respondent: 15451905 / Jonathan Withers</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/7747 | Respondent: | 15451937 / Alistair Jackson | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |
In my opinion land is being opened up for drastic redevelopment without any consideration for the current infrastructure or facilities, which will not be able to meet the planned demand.

I feel most strongly that I have to object to protect the natural landscape of our area. As someone who commutes by train every day in an effort to reduce traffic pollution, I have found the view of an open field as I approach my destination lifts the stress of having to deal with a substandard railway service somewhat.

In light of the recent political upheaval I believe this plan should be shelved until we have a clearer picture of the needs of the future. To act now could be short sighted and cause irreversible damage unnecessarily. I ask you to consider my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7749  Respondent: 15451969 / Rosie Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7753  Respondent: 15451969 / Rosie Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been...
used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7798  Respondent: 15452449 / Carl Sjogren  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7844  Respondent: 15454465 / Marissa Draper  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7845  Respondent: 15454497 / Rick Parker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/7847  Respondent: 15454529 / Janet Tarbet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLP16/7848  Respondent: 15454561 / Charles Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Comment ID: PSLP16/7851  Respondent: 15454593 / Jack Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7863  Respondent: 15454849 / Charlotte Murphy  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7864  Respondent: 15454881 / Mark Fielder  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7866  Respondent: 15454913 / A Burston  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7868  Respondent: 15454945 / Claire Cassar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7870  Respondent: 15455009 / Emma Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7873  Respondent: 15455073 / Amanda Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7875  Respondent: 15455105 / Kate Robinson  Agent:

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7854  Respondent: 15455201 / Edith Dadswell  Agent:

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7857  Respondent: 15455233 / Andrew Hamilton  Agent:

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7903  Respondent: 15455777 / Paul Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the number of homes which the plan says need to be built. How can you justify increasing by nearly 35% the number of houses in West Horsley. I agree there is a need for new homes, but this should be done in a sustainable way which is sympathetic to the current villages. So I can agree with the development of “brown field sites” such as Thatchers(A36) and the Bell & Colvill Garage (A37). But the 4 other proposed developments, A38, A39, A40 and A41 should not be granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7923  Respondent: 15455969 / Eloisa Latin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7950</th>
<th>Respondent: 15456097 / Sheila Mellstrom</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Fifty three years ago my husband and I came to this area for a more rural life and now our children and grandchildren all live here face the awful threat of all being turned into an extension of London by the erosion of the green belt which up to now has protected our lives and homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7939</th>
<th>Respondent: 15456129 / Jean Harding</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7958</th>
<th>Respondent: 15456225 / Ralph Bembridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I have a dreadful feeling that someone, somewhere, is trying their very best to ruin our delightful City of Guildford - a treasure in Surrey. It should be preserved and treasured and not completely ruined by our present team of 'decision makers'.

A 101 more thought has to be given to the proposals - just 'building houses' is. perhaps, the easy part but it's what repercussions there will be from this final. extremely important, decision. More schools, new and better roads to avoid congestion, will certainly be required - the list is end less. The precious "Green Belt' is so im p o r t a n t and should be preserved where ever possible - once if s gone it can not be replaced.

GBC I urge you to look at the situation long and hard - your present proposals a re, simply, not acceptable and I feel sure you will have many residents - who love Guildford - complaining. They should not be overruled and listened to - and take note, of what they say.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7960  Respondent: 15456385 / Steven Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write with regard to the above plan and wish to express my strongest possible objections, not only to our own Parish proposals, but to the principle applied to the whole Borough.
I totally understand that "development" in terms of housing and commercial has to happen, but not on this scale and not at the expense of our vitally important "Green Land". This has to be preserved for future generations and even for the health and wellbeing of the generation of today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7964  Respondent: 15456481 / Doreen Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I recognise the need for a small number of dwellings to be erected in the area but the proposals outline in the Local Plan are outrageous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7974  Respondent: 15457441 / Margaret Lee  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3) I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Notwithstanding that NO one has seen the SHMA figures and how they were calculated, it’s hard to take the figures in the plan seriously and one wonders how the plan has got this far without the transparency required. It’s apparent they are over inflated and no constraints have been applied. Its seems GBC are going for gold in being able to accommodate large numbers of houses that are simply not needed or substantiated.

There are fundamental differences between the 2014 and 2016 plans namely the movement from planning in urban areas to rural ones - and the creation of an Urban Urban areas ( whatever that is)?? It is apparent the GBC is moving its boundaries around to suit the sites suitable for large developments which is not in line with the governments new ruling to ensure SMES are able to partake in building the future housing needs. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

I agree more houses are needed - but these need to be strategically panned - using brown field sites unless there are exceptional circumstances, in sustainable areas - in SURREY 80% of that needs to be Urban as developments in the villages are not sustainable and neither is it possible on already very congested roads to accommodate more traffic.

Surrey does not need more executive homes - what it desperately needs is affordable homes - this can only be achieved by building flats and studio flats - more properties on less land - we could have Iconic 6/10 floor flats along York Road, which is close to the Station and would be much more affordable and as importantly sustainable too.

The plan is fundamentally flawed as 50% of the developments proposed are along the A3 corridor in huge estates - 3 of them with more than 2000 homes - this gets GBC the numbers - but it does not tally with the lack of infrastructure, which is not satisfactorily tackled in the poor infrastructure plan. 3000 of the houses needed are for Students of the university - The University has 17 hectares of car park space and this land could be used to build sustainable student accommodation with parking beneath - this is simple common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8006</th>
<th>Respondent: 15457953 / Ian Symes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the following policies:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy Number: S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy Name: Borough Wide Strategy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Explanation: I object to the very high housing target. Over 80% of Guildford borough land is situated in the green belt and the LP sets a housing target figure which is too high for an area such as Guildford borough that is predominantly green belt – and green belt for the reasons that it stops the spread of London, provides clean air protection to the city and is a place where city dwellers and others can enjoy the countryside within an easy distance of their homes. The continual erosion of the green belt over the last 60 years seems to be accelerating with the LP proposals for swathes of land to be pulled out of the green belt for housing development in contradiction to NPPF 87. This requires very special circumstances for development in the green belt and, as Government ministers have stated on many occasions, the need to meet housing targets is not a very special circumstance. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints, based on the high proportion of green belt in the borough. The housing target is also being driven higher because of:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Over ambitious economic growth targets, 125 new builds per year are due to economic growth. In present circumstances a less ambitious growth target would seem more appropriate.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Future reductions in student numbers at the University of Surrey. Student numbers from Europe are set to reduce as they will shortly have to pay full fees.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. The 14% housing buffer is forcing GBC to identify site selections in the green belt that would not needed if there were no buffer.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8012</th>
<th>Respondent: 15458081 / K C Meldrum</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy S2- the policy is unsound as the G L Hearn OAN is too high and should be set at no more than 510 new homes per year in accordance with the advice of NM Strategic Solutions Ltd. It is unacceptable that no one has been permitted by GBC to cross check the work of G L Hearn and the independent analysis by NMSS makes it clear that there are a number of errors and flaws in the G L Hearn SHMA which should have been picked up and corrected by GBC before the report was approved and published. I take the view that the current GL Hearn SHMA has been discredited.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>As GBC will be aware this NMSS report can be found on the Guildford Residents Associations website.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: PSLPP16/8013  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2- this policy is unsound as the housing target has been inflated; the housing target should be corrected to a figure which is significantly less than the OAN as the final housing target must reflect the impact of the constraints described in the NPPF and which have not been applied across the borough.

Policy S2- I object to the policy as it is unsound as it does not follow the NPPF, the NPG nor the advice of Ministers in the DCLA on constraints. This is a major flaw in the draft Local Plan that I find extremely disappointing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/884  Respondent: 15458081 / K C Meldrum  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Policy S2- The policy is unsound as the OAN is still far too high and should be set at no more than 404 new homes per year in accordance with the advice of NM Solutions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/8019  Respondent: 15458273 / Laila-Marie Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8022  Respondent: 15458369 / Julia Latin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8047  Respondent: 15458593 / Jennifer Shute  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This area of the country is already over crowded. The conservative government has said it would build whole new towns on the North and Midlands not in towns on the overcrowded S.E. They should honour their promises and manifesto.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8055  Respondent: 15459873 / Richard Horn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8056  Respondent: 15459873 / Richard Horn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8899  Respondent: 15460353 / Elizabeth Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17723  Respondent: 15460353 / Elizabeth Hewlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I also object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong></th>
<th>PSLPP16/17352</th>
<th><strong>Respondent:</strong></th>
<th>15460737 / Donna Collinson</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( )</td>
<td><strong>is Sound?</strong> ( )</td>
<td><strong>is Legally Compliant?</strong> ( )</td>
</tr>
</tbody>
</table>

> “4.1.6 Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate).”

Need to be clear that in Green Belt openness is the determinant. Hence, previously develop open land should not be preferred.

> “4.1.8 Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas.”

This policy sequence moves too readily to allocating green field sites and omits to encourage efficient use of previously allocated land or initiatives to assemble brownfield sites. This reflects weaknesses in the Council’s own approach until recently. There is a risk the policy as drafted will also encourage developers to turn too readily to greenfield sites rather than to engage in redevelopment initiatives.

There are errors in the development need identified and the harmful consequences of meeting need have not been weighed in an appropriate assessment.

> “13,860 new homes,” The OAN on which this is based is exaggerated.

> “4.1.10 This is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033.”

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

> “4.1.12 Table 1 shows a number of new homes that is greater than the figure in the policy. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. Further details of these and other sites are provided in the site allocations policy of the Local Plan.”

It in inappropriate to designate more land than required given the constraints.

**Monitoring Indicators**

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.
Object: departures from Green Belt policy including purpose 5, housing figure based on inaccurate and flawed assessment of need

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8091</th>
<th>Respondent: 15461025 / Philip Masters</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in one area of the Borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8094</th>
<th>Respondent: 15461217 / S. Gilby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Objections to Guildford Borough Proposed Submission Local Plan (June 2016) believe that the Guildford Borough Proposed Submission Local Plan (June 2016) is wrong in very any respects, and is poorly conceived, unsustainable, unworkable and, in many ways, unnecessary. I set out here my objections to specific policies and matters within the Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The borough wide strategy is poorly considered. It proposes 13,860 houses being developed cross the borough and does not apply any constraints to reduce the overall housing figure. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The three Wards of Lovelace, Send and Clandon &amp; Horsley are rural wards representing about 11% of the existing housing in the borough. The allocation of sites in the Plan will result in 36% of all new housing being in this area. The allocation strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/8101</td>
<td>Respondent: 15461313 / Anna Price</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I am writing to formally object to the proposed number of houses to be built around Guildford and the surrounding greenbelt and countryside.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This objection is, primarily, based around the adverse effects on rural life and in particular, the health and wellbeing of those who live and work in the area. Such people will, undoubtedly, be impacted, negatively, in terms of the newly placed constraints on their space, privacy, access to amenities and their pace of life. Arguably, any further houses built in these areas will change the landscape and culture of the south-eastern countryside forever. They will, doubtless, deter, rather than encourage tourism in the area: after all, why visit an archived piece of green land in the newly-formed town of Horsley, when you can visit the far prettier Kentish coastline which, fortunately, cannot be built on?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I hope that this letter of objection is viewed, not as a rant nor as a judgement but an opinion that is shared by all the other letters that reach you.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8131</th>
<th>Respondent: 15461633 / Anna Wood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8141</th>
<th>Respondent: 15461665 / Andrew Earle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object to the proposal to build 13,860 new homes. This figure is loosely based on flawed pre-Brexit data. Concerns on the data used have been raised since 2014, but the Council have failed to seek for improved data or release details on the model. Justification for this high amount of additional homes is weak and unsubstantiated. Councillors repeated requests for debate on this has been ignored. Surrounding areas of the county have a much lower target for new homes. Clearly Guildford Council has made some compounded errors in its new home requirement calculation for the area and need to start again in an open, transparent and cooperative way. This should result in a realistic and much lower post-Brexit figure that can be met without resorting to any loss of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1996  Respondent: 15461793 / Paul Smith  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1461  Respondent: 15461889 / Jasper Collinson-Warr  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8182  Respondent: 15462017 / Kevin Rhoades  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
7. I object to the Borough Wide Strategy (Policy S2)

The 13,860 new houses proposal by GBC without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. 5,036 houses are proposed Between the M25 and Burpham (about 5 miles) 5036 houses are proposed. This will lead to a merging urbanisation of identities the villages.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8202  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all other sights in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s AII are out of proportion to the surrounding area and none qualify to take them out of the Green Belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8205  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that new sites have been proposed in this consultation which have not been previously considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8209  Respondent: 15462241 / V.S. Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would conclude by saying that were the recommendations to be implemented, if only in a partial sense, it would mark the end of village life as such in a cultural sense and environmental quality. In other words our quality of life would suffer and no government of whatever colour has the mandate to unilaterally impose that on sections of the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8211  Respondent: 15462305 / Wendy Upham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is quite appalling, the suggestion for literally destroying a beautiful village, it is downright wicked.

I am, as I have written several times totally against it, how many time do we all have to write before someone will listen. I have lived here well over 50 years and seen many changes- not all good.

LEAVE US ALONE I BEG YOU. THE GREEN BELT SHOULD NEVER BE TAMPERED WITH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8207  Respondent: 15462337 / Shirley Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

As a resident of Merrow for 35 years i would like to support , without reiterating, the comments of Merrow Residents Association committee concerning the Local Plan. As our council I feel it is incumbent upon you to preserve everything that is so precious about Guildford, namely its historical value, its architectural beauty, its wonderful views and easy access to Green Belt, all the things which make it such an attractive place to live, work and visit.

GRA report suggests 693 new homes per year is unnecessarily high and the evidence for such a high number seems flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8251  Respondent: 15462785 / Thomas McMinn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8268  Respondent: 15463713 / Tracey Broadhurst-Jones  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8272  Respondent: 15463777 / Jade Broadhurst-Jones  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8276  Respondent: 15463841 / Jessie Macdonald  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8281  Respondent: 15463873 / Ellen Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/8286  Respondent: 15463937 / Joanne Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8298  Respondent: 15464001 / Keiron Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8305  Respondent: 15464129 / Warren Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8311  Respondent: 15464193 / Matthew Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8319  Respondent: 15464353 / Tracey Mills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8349</th>
<th>Respondent: 15464673 / Trudy Grey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8391</th>
<th>Respondent: 15465313 / Carole Crichton-Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO THE 2016 DRAFT LOCAL PLAN:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>To remove Ripley, Send &amp; Clandon from the Green Belt. Garlick's Arch redevelopment of at least 400 houses &amp; industrial site.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2,000 houses proposed for Wisley site.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2,200 houses at Gosden Hillsite.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1,800 houses on Blackwell Farm site. 4-way on/off ramp to A3 at Burnt Common.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The south east -in particular Surrey -has the largest population density of any county within the UK. The proposed development would impose complete &amp; utter overload on the already overloaded infrastructure. This is already straining at the seams with the existing density of people &amp; traffic.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8398</th>
<th>Respondent: 15466113 / Tim Grey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- I object to the scale of new building throughout the borough, which is disproportionate and unjustified;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8399</th>
<th>Respondent: 15466113 / Tim Grey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8404   Respondent: 15466113 / Tim Grey   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8418</th>
<th>Respondent: 15466177 / D.L. + E.J. Wilkinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| • Numbers based on growth and demographic data now invalidated by Br
| • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
| • 13,860 figure confuses the OAN with a housing No definite housing target given, leaving too much scope for the Council to make one up. I can't understand bow we're being consulted when we don't know how many houses the Council wan t to build, taking all the constraints into account.
| • Figures based on a Housing Market A rea that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people com mute or travel far outside the Area to shop or This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 u nits.
| • High numbers involved would transform character of the borough from mainly rura l/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8434</th>
<th>Respondent: 15466209 / Janet Parry-Morris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 1) Late additions to the Local Plan
| I object to the late additions of parts of the local plan, some with less than two-weeks notice. I'm particularly concerned about the Garlick's Arch addition and the new A3/Burnt Common junction. These will have considerable local impact and seem to have been introduced with no prior notification or consultation.
| 2) Development concentrated in one area of the Borough |
A large part of the proposed new housing is concentrated between the M25 and Burpham. I object to the over-concentration of the proposed development in this one area, and its effect on the local community.

3) Limited consultation period

I object to the limited consultation period for the Guildford Local Plan. Everyone would have benefitted from a longer period of consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9818  Respondent: 15466209 / Janet Parry-Morris  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Development concentrated in one area of the Borough

A large part of the proposed new housing is concentrated between the M25 and Burpham. I object to the over-concentration of the proposed development in this one area, and its effect on the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8461  Respondent: 15466945 / A M Wagstaff  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I object to the large amount of development in this one area of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8462  Respondent: 15467905 / C J Reina  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the 2016 Draft Local Plan.

I was horrified and dismayed to hear of the Council's plans to build such huge numbers of houses/developments, particularly between Burpham (and next to Burpham) and the M25 for the following reasons:-

- Loss of Green Belt.
- Disproportionate level of development in one area of the Borough.
- Limited consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8482  Respondent: 15468097 / Allan Hempstead  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8489  Respondent: 15468161 / Jane Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8498  Respondent: 15468417 / A B Buchanan  Agent:
I object to the Plan since Guildford Borough Council have repeatedly changed the proposals at short notice with no consultation and scant regard for the well-being of the local residents.

2. I object to the poorly thought out Plan which Guildford Borough Council propose as you fail to provide evidence to justify the need for the industrial space and the need. An increase in the number of foreign students is no justification to grossly increase the housing in Send. There is no evidence to support the need for this huge increase in housing and industrial development and there are plenty of brown field sites available to meet the required need.

1. I object to the significant industrial development which is inappropriate in the heart of our village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/8502  **Respondent:** 15468609 / Lesley Lane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/8526  **Respondent:** 15469249 / Daniel Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I OBJECT to the Borough Wide Strategy (Policy S2)**

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These need to be revised downwards, possibly quite seriously.
c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need".

Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.

Some 5036 houses are being allotted between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, "West Surrey" is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s

10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley, whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Why build on green belt land when there are alternative Brown belt areas within 3-5 miles which can cope with this better

Please listen to GRA and local residents too before enforcing these change on us. We matter not just pandering to governments promises, after all we are the voters who put you in your current positions

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8634  Respondent: 15473473 / Gordon Prosser  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposal to build 485 new homes as I understand that the use of regulation 19 is unlawful and full consideration requires Regulation 18

I object to the estimate that 13,800 homes are required and that the green belt would therefore be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8646  Respondent: 15474785 / Jules Widdowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The proposed number of homes to be built. Whilst I agree there is a need for new homes, the number of new homes proposed is not sustainable within the current villages and their limited infrastructure. The proposed developments A38, A39, A40 and A41 should not be granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8658  Respondent: 15474849 / Timothy Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand,
would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

I am also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

I therefore object in the strongest possible terms to this plan.

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

I have serious concerns about the scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of my particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, I doubt whether this is actually the case. It is certainly not a vision that is shared by myself, which unequivocally rejects GBC’s Forced Growth policy.

Therefore I object strongly to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8725  Respondent: 15475297 / Jane Patricia Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8895  Respondent: 15477729 / Julia Hoar  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

What is wrong with the conservative councillors? The word conservative should mean keep and safeguard our green and pleasant land, not cover it in concrete! I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8907  Respondent: 15478017 / Kirstie Pankhurst  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8962  Respondent: 15478177 / Michelle Brown  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to register with you my objections to the revised local plan. My overriding concern is the sheer number of houses you propose building. I have seen nothing in your communications that explains why you think this huge number of homes will be necessary over the coming few years. Your figures for likely need are far in excess of even central government predictions and I find myself wondering where all these new residents are going to earn a living. Our local employment is not sufficient to take the extra number of people you are planning for, nor will our local transport and train service manage to carry them all to London for work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9150  Respondent: 15479425 / David Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

This is to register my objection to the current local plan. Without a complete and probably impossibly expensive rerouting of the roads, Guildford will simply gridlock on a much more frequent basis. There is not the wider infrastructure to support the current plans and the planned development would irreparably damage the surrounding, beautiful countryside.

I'm pretty staggered that the current plans have got this far. They would be a disaster if implemented.

Thank you for considering my view

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9388  Respondent: 15479681 / George Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9390  Respondent: 15479777 / Alexandra Trebilco  Agent:
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/9391  Respondent: 15479809 / James Trebilco  Agent: |
|----------|---------------------------------------------------------------|
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need. |
| I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

| Comment ID: PSLPP16/9395  Respondent: 15479905 / K Dormer  Agent: |
|----------|---------------------------------------------------------------|
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need. |
| I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9399</th>
<th>Respondent: 15480097 / E Swapper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9400</th>
<th>Respondent: 15480129 / D Swapper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9402</th>
<th>Respondent: 15480161 / D Crowcey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
</tr>
</tbody>
</table>
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

### Comment ID: PSLPP16/9406  Respondent: 15480225 / Andrew Vovterhalter  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

### Comment ID: PSLPP16/9407  Respondent: 15480289 / Jemima Vovterhalter  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

### Comment ID: PSLPP16/9408  Respondent: 15480417 / J Chequer  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9411</th>
<th>Respondent: 15480545 / L Graham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9412</th>
<th>Respondent: 15480609 / R E Jones</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9414</th>
<th>Respondent: 15480641 / Gillian Battams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9418  Respondent: 15480897 / Graham Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9419  Respondent: 15480961 / Alex Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9420  Respondent: 15481025 / Marion Kincses  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9423</th>
<th>Respondent: 15481185 / Ray Avery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9424</th>
<th>Respondent: 15481217 / C R Avery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9222</th>
<th>Respondent: 15481281 / Simon Tolchard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Local Plan proposes 13,860 new homes to be built across the borough by 2031. This figure is said to be based on an objective SHMA carried out by GL Hearn, consultants whose website openly proclaim their pro-development agenda. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it, despite repeated requests for debate. The assumptions and calculations underlying the model have not been disclosed, protected by a claim to intellectual property. The Council say we should ‘trust the contractors’ model because it is used by a large number of other local authorities’; however this is no guarantee of objectivity. Indeed, at least two recent papers have been published (one by Guildford Greenbelt Group Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association), which challenge the findings of the SHMA.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Furthermore, the housing number is based on projections for economic and population growth pre-BrExit, including migration. These projections should now be revised downwards, possibly quite significantly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/9261  **Respondent:** 15481409 / Amy F Corstin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**I OBJECT** to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints...
may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly consisIt proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migratiThese now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justificati on to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9492  Respondent: 15482977 / Craig Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the proposal to build 13,860 new homes during the plan period (2013-33). The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA). It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. If the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.

I OBJECT to the plan to identify 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people within Guildford borough between 2012 and 2017, and an additional permitted 30 pitches and 2 plots, or any new target as identified within an updated Traveller Accommodation Assessment, between 2017 and 2027. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9501  Respondent: 15483009 / S Acomb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been...
used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Planning Practice Guidance to accompany the NPPF was first published in March 2014 and is kept up-to-date on an ongoing basis. It provides further guidance on the steps that plan-makers should take when determining the objectively assessed housing need in their area.

Paragraph 080 requires that housing “needs should be assessed in relation to the relevant functional area, i.e. housing market area”. This means that authorities should consider the need in those neighbouring authorities with which it has strong economic or migration links, in addition to its own need.

Paragraph 015 goes on to set out that the household projections published by the Department for Communities and Local Government (DCLG) should provide the starting point for estimating the overall housing need.

Paragraph 016 states that wherever possible, local needs assessment should be informed by the latest available information. The NPPF is clear that Local Plans should be kept up-to-date.

Paragraph 018 requires that an adjustment to the starting point should be considered to ensure that sufficient housing is provided to meet the needs of the economy (by increasing the local labour supply). It states: “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area”.

Paragraph 019 goes further, setting out that a further adjustment should be applied if there are market signals indicating an imbalance between the demand for and supply of housing: “prices or rents rising faster than the national/local average may well indicate particular market under supply relative to demand”. Relevant indicators include house prices, rents, affordability and overcrowding.

**Compliance with NPPF and NPPG**

The Proposed Submission Local Plan (July 2016) (Regulation 19 consultation) sets out that the council will make provision for 13,860 additional new homes (Policy S2) over the plan period (2013-2033). This equates to an annual figure of 693 dwellings per annum. This is made up of 517 homes, with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability (total 693).

This figure of 693 dwellings per annum is taken from the West Surrey Strategic Housing Market Assessment (SHMA) – Guildford Summary Report (October 2015) prepared by GL Hearn (Section 4 - Objectively Assessed Need).

The previous iteration of the Local Plan (draft version - July 2014) (Regulation 18) set out that provision would be made for 13,040 new homes over the plan period (2011-31), equating to an annual requirement of 652 new homes a year. This updated figure therefore represents an increase of 820 homes over the plan period, in comparison to the previous (Regulation 18) version.

This increased annual requirement is consistent with the Fully Objectively Assessed Need (FOAN) set out in the West Surrey SHMA October 2015. However, the OAN identified within the 2015 SHMA was based on 2012 population data therefore cannot be considered to be a sound FOAN which meets the requirements of the NPPF and NPPG, as it is not ‘up-to-date’.

**Calculation of OAN**

The NPPG requires that the starting point for the calculation of OAN is the household projections published by the Department for Communities and Local Government (DCLG) when estimating the overall housing need (Paragraph 015). Household projections are derived from the ONS Sub-National Population Projections.

The 2015 SHMA applies household formation rates from the 2012-based household projections to the 2012-based ONS Sub-National Population Projections to provide an appropriate starting point for considering housing need.

**Population projections**

Since the publication of the mid-2012 population projections in 2013, mid-year population projections have been published for mid-2013, mid-2014 and mid-2015. As a minimum, the mid-2014 projections should have been considered.
as the basis for the 2015 SHMA which was prepared in 2015 and published in October 2015, well after the mid-2014 projections were published.

Between both 2013 and 2014, and 2014 and 2015, the population of the UK increased by approximately 0.8% overall, year on year. In both time periods, the population growth in the year to mid-2014 and mid-2015 was greatest in southern and eastern England. The mid-year population estimates for Guildford and resulting population increase is summarised in Table 5.1 below:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford</td>
<td>139,710</td>
<td>141,009</td>
<td>142,958</td>
</tr>
<tr>
<td>% change on mid-2012 projections</td>
<td>+1%</td>
<td>+2%</td>
<td>+5%</td>
</tr>
</tbody>
</table>

Table 5.1 – Mid-year population projections (ONS Sub-National Population Projections)

The figures demonstrate that there has been substantially higher population growth in recent years in Guildford. It can therefore be expected that this will have a material effect on the household projection rates which would be applied in the SHMA relating to Guildford and the surrounding Housing Market Area.

**Household Formation Projections**

On 12 July 2016, DCLG published the 2014-household projections, which update the 2012-household projections. The updated figures project average household growth of 210,000 each year across the country between 2014 - 2039. The household projections are derived from the population projections set out above.

In Guildford, the annual household growth has increased from 499 homes per year (2012-based projections) to 538 homes per year (2014-based projections). This is an absolute difference of 39 homes per year. This indicates that, as expected, Guildford Borough Council needs to account for higher household formation rates and increased housing need when calculating their OAN.

**Five Year Land Supply**

GBC have re-confirmed recently (in the Land at Wisley Airfield decision) that they do not have a five year supply of housing land. This is coupled with the significant and persistent underdelivery in housing over the years, and also the large backlog of housing provision given this persistent under-delivery. This situation all points to GBC planning for more homes and the delivery of them at the earliest opportunity in the Plan Period. It also confirms that GBC should be selecting sites that do not require the delivery of significant infrastructure.

**Delivery of Affordable Housing**

The overall housing target for the borough should be higher to make a tangible difference to meeting the affordable housing needs of the area.

The SHMA concluded that house prices across the HMA are substantially above the South East level. The evidence clearly indicates strong growth in prices and deterioration in affordability over the initial part of the 2001-11 decade. This appears to have contributed to reducing the ability of younger households to get on the housing market.
The SHMA states that there is a shortfall of circa 13,000 affordable homes in the borough, which alone is the equivalent to 718 homes per annum until 2031. The proposed delivery of 693 dwelling per annum does not deal adequately with even the affordable housing needs of the area, let alone the overall market requirements.

If GBC continue to only plan for the minimum requirements then no inroads will be made to address the severe affordability issues in Guildford.

Summary

We consider that the OAN should be underpinned by the most up-to-date evidence, as required by the NPPG, which includes the 2014-based household formation rates for Guildford, and the latest population projections.

We consider that, on the basis of the above, the SHMA should be revised to take into account the latest mid-year population projections in order to meet the requirements of the NPPF and NPPG.

We anticipate that, if this analysis were undertaken, the objectively assessed housing need for the Borough is likely to be higher. It is therefore likely to be the case that the housing target should be increased and the additional housing need should then be met through additional sites within the emerging Local Plan.

In any event, the Council should be seeking to exceed and not simply meet the minimum growth needs of the Borough given previous poor delivery rates to stand any chance of meeting its Objectively Assessed Housing Need.

The Draft Plan as currently worded is not sound because:

- It is not positively prepared as it fails to adequately meet Guildford’s housing need and does not aspire to exceed minimum requirements and build in flexibility;
- It is not justified as it is not based on a robust spatial strategy to meet housing need; and
- It is not effective as it is unlikely to deliver enough new homes over the Plan period and at the right time.

Policy S2 - The Spatial Vision

The Borough’s spatial strategy is set out within Policy S2 Planning for the borough – our spatial development strategy and the supporting text. Paragraph 4.1.6 states that the Council will focus growth to the most sustainable locations, determined by a spatial hierarchy, which identifies a ‘brownfield first’ approach. Policy S2 sets out that growth will therefore be directed to:

- Guildford town centre;
- Urban areas;
- Inset villages; and
- Identified Green Belt villages.

This order of preference has been carried forward from the previous iteration of the Local Plan (July 2014) (paragraph 4.4). This hierarchy reflects the most sustainable options for growth, in line with the NPPF. We do not dispute this approach.

However, paragraph 4.1.8 recognises that these four preferred locations are unable to accommodate all the new development that is needed and that therefore additional development should then be directed to:

- Countryside beyond the Green Belt;
- Urban extensions to Guildford and Ash and Tongham;
- New settlement at the former Wisley airfield; and
- Development around villages (including some expansion).

Given that Guildford is the Borough’s most sustainable settlement it is wholly logical that, in accordance with the overall spatial vision, development should be directed towards urban extensions to Guildford (and Ash and Tongham) ahead of new settlements (ie Wisley airfield) and development around villages (ie Normandy and Flexford village expansion).
In reality, however, the robustness of the spatial strategy has been undermined by two factors; the Council’s over-riding priority to the protection of the Green Belt over the presumption in favour of sustainable development and the exceptions made to include some large strategic sites low down in the hierarchy based on the infrastructure they could provide.

In terms of the Liddington Hall site, whilst this falls fairly high in the hierarchy given its sustainable urban edge location, the site has been removed from the latest Proposed Submission Local Plan (Regulation 19 version) because of its perceived high Green Belt sensitivity scoring. (We look into this matter in more detail in Chapter 8)

Conversely the new strategic site at Normandy and Flaxford, has been allocated for 1100 units despite its lowest ranking in the hierarchy, and its poor green belt sensitivity scoring on the basis that it will provide a new secondary school.

Similarly Wisley, which again falls below Liddington Hall in the hierarchy has been allocated because the scale of development (2100 new homes) will provide other uses that benefit the wider community and because of the infrastructure which can be provided.

The impact of this approach is that growth will not be focused on the most sustainable locations in conflict with the aspirations of the NPPF and policy S2 of the emerging Plan.

The Draft Plan as currently worded is not sound because:

- It is not justified as it is not based on a robust spatial strategy to meet housing need.

Policy S2 - Proposed Housing Strategy

As is set out within Section 5 above, the proposed Submission Version of the Local Plan identifies housing sites within the urban area, on the edge of the urban area, and within the Green Belt to meet the housing target of 693 dwellings per annum (13,860 homes across the plan period 2013- 2033).

Over-reliance on a limited number of strategic sites outside the built up area

The Council is relying heavily on a limited number of strategic housing sites outside the built up area at Ash and Tongham, Gosden Hill Farm, Blackwell Farm, Wisley Airfield and Normandy and Flexford village expansion to deliver a considerable proportion of its new housing across the Plan period (approximately 8,000 new homes – or almost 60% of the overall target).

Such strategic sites are inherently more complicated and take longer to start delivering new homes. The heavy reliance on such sites (60% of the total target) is likely to create greater pressure on housing delivery in the Borough as the majority of housing will come forward later on in the plan period.

The major sites are set out in Table 7.1 below.

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Delivery period</th>
<th>Draft Site Allocation</th>
<th>Reference</th>
<th>Total number of homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ash and Tongham Strategic location of growth</td>
<td>1,262</td>
<td></td>
<td>Land to the east of White Lane, Ash Green</td>
<td>A28</td>
<td>62</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Land to the south and east of Tongham and Ash</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 7.1 – Key strategic sites (draft allocations)

Policy S2 - Proposed Housing Strategy

Policy S2 states that the delivery of homes is expected to increase over the plan period reflective of the timescales associated with the infrastructure improvements required to deliver these strategic sites.

Furthermore paragraph 4.1.9 of the supporting text to Policy S2 acknowledges larger development sites, including the strategic development sites, will deliver the majority of new development in years 6-10 and 11-15 of the plan period.

This is consistent with the information contained within the Latest Land Availability Assessment (LAA) (February 2016) which confirms that on these large strategic sites a high proportion of the dwellings will be delivered in the later phases of the Plan period rather than from Year 1. For example, at Wisley airfield only 150 of the 2100 new dwellings are expected to be delivered in the first five years, with 500 expected during the plan period 6-10 and the remaining 1,450 in Years 11-15 (Housing Trajectory, page 20, LAA 2016).

Despite this, within the Site Allocations section of the Plan (page 122) it states:

“Phasing of sites across the plan period is not proposed in the site policies. Allocated sites are encouraged to progress development proposals as soon as possible, to help provide housing in the earlier stages of the plan period, to help boost housing supply. Equally, where allocated sites have been identified as likely to deliver in the later years of the plan period due to constraints, if these are resolved sooner, development proposals are encouraged.”

We consider that it is unrealistic to assume that these strategic sites will be brought forward to boost housing supply in the early phases of the plan period (years 1-5 and 6-10) and have serious concerns over whether they will deliver significant numbers of homes during the Plan period for the reasons set out below.

Deliverability of Strategic Sites outside of the built up area

We set out below a number of factors which will affect the deliverability of these larger strategic sites. In many cases there is serious doubt as to whether they can realistically be delivered until, at the very least, towards the later phases of the Plan period (if at all during the Plan period) because of the significant infrastructure requirements associated with them. The Council should not be allocating such sites without certainty that such constraints can be adequately addressed.
Ash and Tongham Urban Extension

The Council consider that this strategic area of growth is likely to generate 1,241 homes to 2033.

Guildford recognises that extensions to Ash & Tongham are being delivered on a piecemeal basis and therefore housing is being delivered without any wider supporting and infrastructure benefits. Therefore, it may be more difficult to ensure that the appropriate connections can be secured in a comprehensive and structured manner.

It is interesting to note that whilst the June 2016 Topic Paper: Housing Delivery considers that the harm associated with additional growth in this area would significantly and demonstrably outweigh the benefits to the Borough, the two site allocations making up this urban extension are still included in the Submission Version of the Local Plan.

Blackwell Farm

As is set out in Table 7.1 above, Blackwell Farm is allocated for 1,800 homes in the Draft Submission Local Plan. The site would require more than one access point due to the quantum of development. It is proposed that the existing junction between the A31 and Down Place will be upgraded to form one access, which is located on a 50mph stretch of the A31. This access will require construction in an Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV). No detailed design of this upgraded access has been provided, and it is unclear whether it is practical or possible to provide a junction at this location.

Furthermore as this access would provide access to the Surrey Research Park, Surrey Sports Park, University of Surrey and Royal Surrey County Hospital there would a high level of traffic. This could be problematic due to the close proximity of the bridge on the A31. Against this context, there is likely to be a lengthy design, review and implementation process, with involvement from Highways England.

There are no details provided of where a second access would be located.

In terms of sustainable modes of transport, the development is required to contribute to a new Guildford West (Park Barn) railway station which would offer railway connections. However, the deliverability of a new railway station is likely to involve a lengthy process in terms of planning and construction, as well as securing funding.

The site is currently poorly served by bus services, which would require significant investment to be upgraded. The site is proposed to be part of the Sustainable Movement Corridor however this is not likely to be delivered until 2033.

In light of the above, there are significant unknowns over the access to the site, whether Highways England are supportive of the access proposals, and the timing of a new railway station at Park Barn which is the key to securing sustainable access to the site.

Gosden Hill Farm

Gosden Hill Farm is allocated for 2,000 new homes, however, the site is poorly connected to the public transport network and being bound to the A3 to the north, is likely to encourage car-borne trips. The site is not sustainable.

As part of the new development, a new railway station known as Guildford East (Merrow) station and Park & Ride scheme would be delivered. This site is also proposed to be part of the Sustainable Movement Corridor which again, is a long term project (to be delivered by 2033), some of which has not yet been designed. Similarly, there are questions around when the railway station could be delivered.

New bus services would also need to be implemented to support residential development, as existing services are not set up to accommodate this level of additional development, as well as being located around 1km from the site.

Again, there are serious question marks over the sustainability and deliverability of the scheme.

Wisley airfield

Wisley Airfield is allocated for approximately 2,000 new homes and a mix of other uses.
The proximity of the site to the trunk road network which is more than likely to encourage car trips.

Planning permission for the redevelopment of Wisley Airfield (including 2,068 new homes) was recently refused by Guildford Borough Council on 8 April 2016. Reason for Refusal 3 stated that the application had not demonstrated that the proposed development would not give rise to severe adverse impact on the safe and efficient operation of the strategic road network (A3/M25), nor that it would not give rise to a severe impact to the efficient operation of the local road network (in particular in Ripley and the junction of Newark Lane/Rose Lane).

Whilst Guildford’s topic paper: Housing Delivery notes that “further work has been undertaken” in relation to the anticipated traffic impact, it is unclear whether suitable mitigation can be achieved and agreed with both Highways England and Surrey County Council.

The scheme had also promised to deliver accesses onto the A3 (Ockham Interchange), Ockham Lane and Old Lane and revised access to Elm Corner. A major new access onto the A3 would require significant consultation with Highways England and could prove to be a relatively lengthy process.

The site is remote from major settlements and the public transport network with the closest bus stops currently 1.6 km to the west of the site.

The accessibility of the site needs to be substantially improved in terms of public transport facilities to avoid becoming a car dominated development. Condition 4 of the recent planning permission related to the applicant’s failure to deliver transport sustainability measures to enable sustainable travel choices to be made to minimise the reliance on the private car.

Given that permission has recently been refused on this site on highways impact grounds and sustainability, there is clearly uncertainty over the deliverability and suitability of the site.

**Normandy and Flexford Village expansion**

The site has been allocated for (amongst other things) up to 1,100 homes.

The site is located a significant distance from the main urban centres of Guildford and Aldershot and has a relatively poor provision of local facilities in its vicinity which is likely to encourage car borne trips. It would need to deliver highway improvements as well as a significant bus network and improvements to the off-site cycle network to minimise the reliance on cars, all of which would require significant investment and planning.

The Council is looking to bring forward this site allocation as a deviation from its Spatial Strategy because it will contain a new 7 form secondary school.

It appears that the village expansion has been identified due to its ability to deliver a new school rather than because it is the most suitable and sustainable option available to the council.

**Summary**

The delivery of these key strategic sites are dependent upon securing major transport or other infrastructure improvements. In many cases this is dependent on the agreement by statutory third parties to deliver such improvements. It brings into question their deliverability within the Plan period, or at least during the early stages of the Plan when houses are most needed in Guildford. The Council should not be allocating such sites when there is still uncertainty as to whether feasible design solutions can be achieved, particularly when more sustainable options are available such as Liddington Hall.

**Deliverability of Liddington Hall**

Land at Liddington Hall lies within a sustainable location compared to the strategic sites referred to above with scope to deliver meaningful transport improvements. It lies on the edge of Guildford (which is the Borough’s most sustainable urban area) and within easy reach of the Fairlands Estate. It is well-served by local bus routes with good cycling connections to the town centre.
There is sufficient highway capacity to accommodate development and appropriate and suitable accesses into the site can be achieved. It is not dependent on significant off-site infrastructure improvements in the same way as many of the strategic sites.

The site is in single ownership and is available for development within years 1-5 of the Plan Period without insurmountable obstacles to delivery.

The site has been promoted through the Local Plan process over a number of years, and has previously been identified as being suitable for housing within previous iterations of the Land Availability Assessment (LAA) subject to release from the Green Belt;

Not only would the funds raised by the disposal of the land be entirely re-invested to provide improvements of Guildford College (a significant benefit in its own right), the redevelopment of the site would help plug the gap in housing delivery in the earlier phases of the Plan period.

It is essential for the Council to increase the delivery of housing now (years 1 – 5) through the release of sites like Liddington Hall to counteract the persistent under-supply of homes in previous years, which has led to an unprecedented demand within the Borough and indeed across the South East. The reliance on housing being delivered on strategic sites later on in the plan period should be resisted to avoid compounding this position.

The Council cannot demonstrate a five year supply of housing and the allocation of additional housing through the local plan process would go some way to remedy this, particularly sites like Liddington Hall which are likely to be able to deliver a significant number of new homes, (approximately 600 homes) in the first five years of the plan period.

**Over-reliance on Windfall Sites**

Table 2 of Policy S2 (Planned Delivery of new homes between 2018 and 2033) confirms that the Council is relying on the delivery of 625 homes through windfall sites over the 15 year period. The LAA (2016) sets out that this equates to 50 units per year in years 6-10 and 11-15 (500 over a 10 year period), plus 125 in the first five years. This is reduced to avoid double counting.

The NPPF requires that a windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence (Paragraph 48). Within the LAA, the Council set out that over the last 10 year period (2006 – 2016), 809 homes have been granted planning permission on sites delivering less than 5 units (in accordance with NPPG). 256 homes were making use of residential gardens, which must be discounted. This leaves 553 homes, which equates to approximately 55 units per year, although this has peaked and troughed over the last 10 year period.

The LAA goes on to state that, as the Local Plan has not been updated since 2003, the majority of housing completions have been from windfall sites, but that this is not expected to continue. It therefore seems overly optimistic to suggest a similar rate of windfalls in Years 6-10 and 11-15, particularly given that this is when the key strategic sites are expected to come forward.

The heavy reliance on windfall sites to make up the housing targets will also result in lower levels of family housing being delivered, as these sites typically deliver smaller, flatter units, (ie through office to residential conversions) often without any provision of affordable housing.

The Council needs to consider releasing greenfield sites like Liddington Hall to deliver both the quantum of housing needed within the next five years and also the type/mix of housing most needed, including affordable housing to deal with the current acute housing need.

**Policy S2 - Evidence Base**

**Green Belt Review**

**Policy Background**
Paragraph 83 of the NPPF allows for Green Belt boundaries to be altered though the Local Plan process in exceptional circumstance (which should include the inability to accommodate its objectively assessed housing need (OAN) within existing urban areas).

When reviewing Green Belt boundaries, paragraph 84 of the NPPF advises Local Planning Authorities to take account of the need to promote sustainable patterns of development.

Paragraph 85 of the NPPF sets out a number of criteria that Local Planning Authorities should have regard to when defining boundaries. These include (of relevance):

- Ensuring consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not including land which it is unnecessary to keep permanently open;
- Being satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Defining boundaries clearly using physical features that are readily recognisable and likely to be permanent.

**Guildford’s Core Evidence Base**

The Guildford Green Belt and Countryside study (including addendums) forms the Council’s primary evidence base underpinning the selection of potential Green Belt site allocations as part of its Green Belt review to accommodate the required growth within the Borough as set out in policy S2 (Spatial Strategy) of the submission version of the Local Plan.

The study assesses land parcels against their contribution to each of the following four purposes of the Green Belt set out in paragraph 80 of the NPPF by a simple a scoring system (1 denoting low Green Belt sensitivity whilst 3 / 4 denoting high Green Belt sensitivity):

- to check the unrestricted sprawl of large built up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment; and
- to preserve the setting and special character of historic towns.

The Housing Delivery Topic Paper that supports the Proposed Submission Local Plan states, at paragraph 4.91, that any land parcels that fall within a red (high sensitivity) land parcel should be excluded.

In terms of the Liddington Hall site, Volume II (February 2013) identified the site to contribute notably to the purposes of the Green Belt (sensitivity score of 3). The site has therefore been discounted from the Proposed Submission Local Plan (Regulation 19 version).

**Robustness of Evidence Base**

On behalf of the Guildford College Group, LDA Design have prepared a detailed report which challenges the robustness of the methodology and conclusions presented in Guildford Borough Council’s Green Belt and Countryside Study (including addendums).

A full copy of this report is included in Appendix 3 but the key findings are summarised below.

**Over-reliance on Green Belt sensitivity scoring in Green Belt site selection**

In the absence of any definitive best practice guidance from Central Government on the Green Belt review process, LDA acknowledge that the approach taken by the Council is consistent with Green Belt reviews undertaken by other Green Belt authorities. This includes a four stage process comprising the identification and definition of land parcels, an assessment of the contribution each land parcel makes to the four Green Belt purposes, the sustainability credential of land parcels and an assessment of the environmental capacity of the land parcels to accommodate appropriate development.
The main criticism is that where a land parcel has been assessed as having a high Green Belt sensitivity (in the case of Liddington Hall where it scores 3 out of 4) then the site has been removed as a potential site allocation, whatever the site environmental and or sustainability scoring might be or where it might fall in the Council’s spatial hierarchy. It is clear from the officer’s report to the Extraordinary Meeting of the Council on 24 May 2014 that the greater emphasis on the need to protect the Green Belt has been an over-reaction to public comments during the Regulation 18 consultation and this has to be rebalanced.

Furthermore, LDA has pointed out that some locations that fulfil more or the same number of purposes as other areas (and therefore meet the Green Belt ‘test’), may have capacity to accommodate development without undue harm being caused to Green Belt as compared to other apparently similar, less or more sensitive areas. This may be as a result of fewer ‘absolute’ constraints to development allowing for mitigation measures to be adopted as part of a well-considered masterplan. Conversely areas of Green Belt might only fulfil a single purpose and yet have no capacity to accommodate development, without undermining the very purpose of the Green Belt itself.

**Lack of comprehensive and transparent evidence base**

LDA consider that the scoring system adopted by the Council is overly simplistic leading to a binary outcome for each Green Belt purpose.

Furthermore there is no supporting information which explains or qualifies how the conclusions have been reached.

LDA advise that a more rigorous and qualitative approach is needed for each land parcel to assess the degree to which the land parcel contributes to each of the Green Belt purposes.

**Incorrect Green Belt Scoring for land at Liddington Hall**

Even using this simple methodology adopted by the Council, the Green Belt and Countryside Study has incorrectly scored Liddington Hall (land parcel J1) in respect of two of the purposes of the Green Belt, namely the prevention of Guildford and Fairlands from merging and the restriction of urban sprawl.

To demonstrate this LDA has undertaken an independent assessment of the site and its immediate hinterland, which has been informed by a number of site visits and a review of relevant background material, including the Guildford Local Character Assessment and Guidance. Their findings are set out in Section 4 of their report.

LDA conclude that the Liddington Hall site has a very limited role in preventing the merging of Guildford and Fairlands. The separation of developed areas is to a large degree upheld by the mature and substantial vegetation framework which adjoins the site and which is considered to have ‘permanence’ by virtue of its intrinsic landscape, biodiversity and amenity value. Removal of the site from the Green Belt would not compromise the integrity and screening function of retained vegetation despite a narrowing of the physical gap between settlements.

This judgement is supported by recommendations made in the GBCS Volume II Addendum (April 2014).

> “The parcel (Liddington Hall) was highlighted as being potentially sensitive in terms of coalescence with Fairlands to the west. However, a strong area of woodland would be maintained between any development within the western part of the parcel and the eastern edge of Fairland, meaning the visual connectivity between the two settlements could be limited appropriately.”

There are no reasons to explain why these recommendations were not incorporated into the subsequent draft of the Proposed Submission Local Plan and the Liddington Hall scoring remained unchanged.

LDA also conclude that the Liddington Hall site has only a limited role in containing the sprawl of urban areas. The encroachment of residential properties and, to a lesser extent, industrial facilities along its boundaries following the designation of the Green Belt establishes a development context beyond the core area of Guildford.

It is judged that a new permanent and definable boundary could be established along Gravetts Lane and the A323 which would be more effective in the long term in preventing further creep of development into the more sensitive rural
landscape to the west. If Liddington Hall’s Green Belt sensitivity score is updated to properly reflect the LDA conclusions, then its sensitivity score can be reduced to 2 (medium sensitivity).

The Council acknowledge that because Guildford town is their most sustainable settlement and urban extensions (including land at Liddington Hall) fall fairly high in their Spatial Hierarchy, there are good reasons to explore both low sensitivity and medium sensitivity Guildford urban extension land parcels.

Therefore, the Council should re-consider land at Liddington Hall alongside the other Guildford urban extension sites (Blackwell Farm, Gosden Hill farm and Keens lane) having regard to its sustainability or environmental capacity and certainly ahead of allocations such as Wisley and Normandy and Flexford (which are lower down the settlement hierarchy and are in less sustainable locations).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- 22680003_Land_at_Liddington_Hall_Part3.pdf (8.8 MB)
- 22680003_Land_at_Liddington_Hall_Part2.pdf (9.4 MB)
- 22680003_Land_at_Liddington_Hall_Part1.pdf (1.1 MB)
- 22680003_Land_at_Liddington_Hall_Part4.pdf (8.0 MB)

Comment ID: PSLPP16/9584  Respondent: 15483553 / Robert Bastable  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9598  Respondent: 15483713 / Claire Walker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am fully supportive of the responses submitted by the Guildford Residents Association (GRA) about this Submission Local Plan.

I wish to emphasise my concern about:

1. the lack of suitable infrastructure for the massive increase in housing proposed.
2. the proposal to use green belt land for so much of the housing when brownfield possibilities have not been fully explored and used first.

I believe that the Objectively Assessed Need figure of 693 homes per annum for future housing is excessive and based on flawed calculations within the SHMA.

The OAN should also take account of constraints inherent in Guildford Borough, such as:

- the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion, within the Borough
- the risk of flooding in a large number of key areas of the Borough
- the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for development (see below)
- the fact that Guildford is both an historic town and a “gap town”, both of which reduce its ability to easily correct the infrastructure deficiencies
- Protected wildlife areas
- Landscape areas

I strongly oppose the submission local plan as it currently stands, and hope that changes will be made to address my concerns and the more detailed concerns as in the GRA response.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
My main objections to the Guildford Local Plan are as follows;

During the previous consultation there was much publicity, documentation, booklets and CD’s available for people to look at and to read. There was also much interest in the Local Plan. That was seen as a done deal with the views of the people being taken into consideration. In fact the main areas which had Pop-Up consultation points seem to be the areas which are now being removed from the Green Belt, cleverly worded as “Inset from the Green Belt” One might think that ‘Inset’ meant included! Further to those initial consultations, this current DRAFT Local Plan seems to completely ignore the concerns of the local people regarding the loss of the Villages surrounding Guildford. Removing these villages will inevitably mean that the character of the whole area and Guildford Borough will be lost. Most of these areas are those with AONB status and other recreational value.

I have a particular concern about the way the Local Plan is worded and put together. Most people would not be able to wade through the vast amount of text and plans, evidence and policy which is quoted. It is not a simple document to read and is not summarised sufficiently. I think that each Parish Council should have responsibility for fully revealing the Draft Local Plan, showing the local impact, the impact on the Guildford Borough and in addition how that impacts on the whole region when taking other Borough Local Plans into consideration. Where have GBC included ideas from local residents?

I do not think the Draft Local Plan takes into account the real impact of huge areas of development around Guildford and beyond, after all we do not live in isolation of the rest of the South East and the huge traffic and transport problems we see on a daily basis on the M25, A3, M3, A31 and all the major train routes into London. These are what need addressing in the local plan. Furthermore, all the major arterial roads and side roads are at a standstill during most days rush hour (or 3) period and whenever there is any kind of incident. People generally have to travel away from Guildford to work and this has put more pressure on the local infrastructure. The Plan should be looking to address the real issues which currently exist. Why go for growth when the fact is that it is not sustainable in terms of everyday life. Local transport, local schools and access to the NHS services are way overstretched with children having to travel miles to a place at primary school, further burdening the transport system.

The DRAFT Local Plan identifies sites with current planning applications as available to increase housing quotas. Some have actually been refused on several occasions, including through the Appeals to the Secretary of State process. Why are these planning applications being included in the numbers, they are also not defined as affordable which is a wasted opportunity to provide additional affordable housing. Several areas around Shalford and Chilworth had been identified on the previous plan as areas for development; they are no longer included in the DRAFT Local Plan but are within the Green Belt. Chilworth in particular has already seen a vast increase in houses which are in no way affordable and to the benefit of the local population. It is obvious that once these areas are removed from the Green Belt there will be no protection against development, as development is considered to be ‘approved in principle’. This development is seen as growth, but for Profit; not in perpetuity. The DRAFT Local Plan also identifies areas to the north of Guildford and along the A31 Hogs Back corridor, for development; this area has also seen a substantial increase in density and areas for commerce and includes the University of Surrey plans which have already been agreed.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9664</th>
<th>Respondent:</th>
<th>15485185 / Roland Mansell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I have a particular concern about the way the Local Plan is worded and put together. Most people would not be able to wade through the vast amount of text and plans, evidence and policy which is quoted. It is not a simple document to read and is not summarised sufficiently. I think that each Parish Council should have responsibility for fully revealing the Draft Local Plan, showing the local impact, the impact on the Guildford Borough and in addition how that impacts on the whole region when taking other Borough Local Plans into consideration. Where have GBC included ideas from local residents?

The DRAFT Local Plan identifies sites with current planning applications as available to increase housing quotas. Some have actually been refused on several occasions, including through the Appeals to the Secretary of State process. Why are these planning applications being included in the numbers, they are also not defined as affordable which is a wasted opportunity to provide additional affordable housing. Several areas around Shalford and Chilworth had been identified on the previous plan as areas for development; they are no longer included in the DRAFT Local Plan but are within the Green Belt. Chilworth in particular has already seen a vast increase in houses which are in no way affordable and to the benefit of the local population. It is obvious that once these areas are removed from the Green Belt there will be no protection against development, as development is considered to be ‘approved in principle’. This development is seen as growth, but for Profit; not in perpetuity. The DRAFT Local Plan also identifies areas to the north of Guildford and along the A31 Hogs Back corridor, for development; this area has also seen a substantial increase in density and areas for commerce and includes the University of Surrey plans which have already been agreed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9665</th>
<th>Respondent:</th>
<th>15485217 / Fiona MacKenzie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This 'Plan' is ill-conceived, badly thought through, and needs to be scrapped.

I would also like to know why the consultation period has been so limited, especially with a decision of such magnitude (2,000 homes at Gosden Hill and, potentially, over 6,000 planned new homes in total), which will have far-reaching implications on the overall quality of life of residents in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As residents of Ripley for 17 years where we wanted a quiet village life we are appalled to hear of the recent plans for Ripley and surrounding villages and the fact that these plans were only given 6 weeks to object.

Our objections are:

The disproportionate amount of development in one area of the borough.

Site A43 Garlicks Arch
Site A45 The Talbot
Site A57 The paddocks
Site The paddocks

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9711  Respondent: 15485441 / John Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have read your proposed local plan and particularly the suggestions with regard to East and West Horsley – including Wisley airfield.

I fully understand the need for a steady increase in new housing to meet the demands of a growing population. But your plan seems far too aggressive in its proposal to increase the size of settlement areas such as East Horsley and to effectively take the village out of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9717  Respondent: 15485473 / Eilish Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally, there appears to have been little consultation with Resident Associations or Parish Councils. Is GBC actually listening at all?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9748  Respondent: 15485761 / Dominic Carpenter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I think the plans would cause overcrowding to all local services especially the local traffic which is already very congested so therefore I am opposing the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9774  Respondent: 15485985 / Jean Dunning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate amount of development in one part of the Borough. In a five mile distance 6500 homes are proposed to be built

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9788  Respondent: 15486017 / Neil Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to a Local Plan which does not maximise the use of existing brownfield sites – These should be regenerated and used for housing – in particular the Social Housing which this flawed model does not correctly address. The Brownfield site at Burnt Common should be used for new housing needs and not the greenbelt site at Garlick’s Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9792</th>
<th>Respondent:</th>
<th>15486049 / Ceri Schooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Unbalanced allocation of development in one area of the Borough
Why should one area have so much development in the Borough, unbalanced and therefore I object.

Disproportionate size of sites in relation to rural locations
I object to the size of the sites at Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). They are totally disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10717</th>
<th>Respondent:</th>
<th>15486049 / Ceri Schooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Disproportionate size of sites in relation to rural locations
I object to the size of the sites at Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). They are totally disproportionate.

Unbalanced allocation of development in one area of the Borough
Why should one area have so much development in the Borough, unbalanced and therefore I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10719</th>
<th>Respondent:</th>
<th>15486049 / Ceri Schooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours, it would only make transport much worse.

5. Congestion on the local village roads and lanes
I object as more traffic would mean terrible congestion for villages and lanes.

6. Unsuitability of our local roads for heavy vehicles and more traffic
The local roads in the area are very narrow.

7. Poor air quality concerns
I object as it will mean greater air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9810  Respondent: 15486081 / Rosie Ainsworth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9820  Respondent: 15486177 / Daniel Peyton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9829  Respondent: 15486305 / Noel Ainsworth  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9842  Respondent: 15486849 / Eric Waestaff  Agent:

Comment ID: PSLPP16/9863  Respondent: 15486977 / P Jefferson  Agent:

Comment ID: PSLPP16/9885  Respondent: 15487233 / Lindsey Schravetta  Agent:
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9893  Respondent: 15487297 / L.A. Crane  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9900  Respondent: 15487521 / A Malcmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9917  Respondent: 15488065 / Heather Beaver  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9932  Respondent: 15488193 / Tracey Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9948  Respondent: 15494977 / Carol Adams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9955  Respondent: 15495201 / Viliv Viana  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the housing targets set out in Policy S2.

If the proposed plan were to be implemented, it would represent an increase in housing stock to support a population increase of 25%. However, the ONS projects a population increase of 15%.

I understand that the 25% increase is the result of a Strategic Housing Market Assessment which was conducted by an external consultant and based on a mathematical model. Critically however, the details of this model have not been explained in the plan. I further understand that Guildford Borough Council are also unaware of the basis of this mathematical model.

Given that the conclusions from the SHMA study underpin the entire plan, they cannot be accepted as an article of faith. The assumptions and algorithms must be fully explained and then subject to rigorous review. Furthermore, the differences between the Strategic Housing Market Assessment and the assessment of the ONS must be fully understood and reconciled.

Without such analysis it is difficult to understand how any responsible body could submit this plan for approval. Or perhaps GBC are simply following the advice from the film ‘Field of Dreams’ – build it and they will come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10451  Respondent: 15495393 / M Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10435  Respondent: 15495457 / R Laroche  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/9995  Respondent: 15495489 / Stephen Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10002  Respondent: 15495585 / Cristiano Vitor De Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10467  Respondent: 15495617 / Peter Elliot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10009  Respondent: 15495649 / Stephen Cruse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Local Plan as the proposed development will not be sustainable (Policy S1)

NPP states that the purpose of the planning system is to contribute to the achievement of sustainable development.

This development of over 13,500 homes during the Plan period is not sustainable and will have a permanently detrimental impact by over development of villages in particular between Guildford and the M25 including Ripley, Send & Clandon. The services in these villages are not adequate to cope with the levels of development proposed and these developments do not meet with the needs of the local communities.

Garlicks Arch (A43) and Wisley Airfield (A35) are in unsustainable locations with a total lack of sustainable transport - bus services are infrequent and routes have been reduced, no railway stations within walking distance leaving residents reliant upon cars. There are no plans to improve the infrastructure for Garlicks Arch within the infrastructure plan and once again residents will be reliant on the car. These developments should be considered in areas such as Guildford where sustainable transport can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pcslp171/1555</th>
<th>Respondent: 15495873 / Gerard Duvè</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Policy S2 – Planning for the Borough**

I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).

I object that the amended draft does not encouraging utilising the numerous surface public car parks in to provide sustainable homes.

I object to the amended plan ignoring the government’s NPPF guidelines - “……. local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”

I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10055</th>
<th>Respondent: 15495937 / C Aruncel</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9. I object to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10145  Respondent: 15497441 / Holly Hicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10159  Respondent: 15497505 / Jyoti Nanda  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial,and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on
open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10166</th>
<th>Respondent: 15497633 / Diane Nichols</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The vast numbers of new housing planned seem to be disproportionately distributed throughout the borough with over 40% of the number affecting the Burpham side of the town and the A3 between it and the M25.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10182</th>
<th>Respondent: 15497761 / N Wadey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crucially there is no infrastructure or road network that can cope with this number of dwellings. The road situation must be addressed before any planning is passed. The A3 is frequently gridlocked through Guildford and northwards to the M25; extra housing will only exacerbate the situation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10187</th>
<th>Respondent: 15497857 / Elisabeth A Hawkey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10195  Respondent: 15497889 / Hugo Wadey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10200  Respondent: 15497953 / Rebecca Dougherty  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10212  Respondent: 15498049 / Natasha Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10229</th>
<th>Respondent: 15498241 / Faye Church</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10233</th>
<th>Respondent: 15498369 / Kris Steadman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10247</th>
<th>Respondent: 15498785 / Catherine Elingworth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10252</th>
<th>Respondent: 15499297 / Alex Mundy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to the neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10257  Respondent: 15499297 / Alex Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10259  Respondent: 15499297 / Alex Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10267  Respondent: 15499873 / Pan Illingworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10276  Respondent: 15500065 / Rachael Illingworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10277  Respondent: 15500129 / Lauraine Banks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4. I OBJECT to the proposed development sites in East and West Horsley (A36-41). Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10291</th>
<th>Respondent: 15500161 / Joanna Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, we are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. **On MY community!**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10280</th>
<th>Respondent: 15500449 / John Banks</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>

4. I OBJECT to the proposed development sites in East and West Horsley (A36-41). Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10282</th>
<th>Respondent: 15500513 / Alex Illingworth</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10287</th>
<th>Respondent: 15500801 / Morgan Schooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10290</th>
<th>Respondent: 15501025 / A. P. de Geus</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>° We support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td>Attached documents:</td>
<td></td>
</tr>
<tr>
<td>Comment ID:</td>
<td>PSLPP16/10301</td>
<td>Respondent:</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17096</th>
<th>Respondent:</th>
<th>15501217 / Luke Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The council have chosen not to impose any constraints in respect of the OAN.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17101</th>
<th>Respondent:</th>
<th>15501217 / Luke Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10309</th>
<th>Respondent:</th>
<th>15501313 / Matthew Dougherty</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

Section page number
Page 1358 of 1722

Document page number
2059
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10314</th>
<th>Respondent: 15501377 / Elmbridge Borough Council (Karen Randolph)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Gypsies, Travellers and Travelling Showpeople

Policy S2: Borough Wide Strategy sets out the proposal to provide 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople over the period 2012-2017. A further 30 pitches and 2 plots are then proposed between 2017 and 2027. In regard to the provision of new pitches and plots, the Council would like to reiterate the comments it made on the Draft Plan, namely:

- it is confusing that the time periods stated above do not cover the same time period as the Submission Plan.

Given that the plan period is from 2013-2033, the Council is concerned as to how the additional need for pitches and plots beyond 2027 will be accommodated, as identified through an updated Traveller Accommodation Assessment (TAA). The Council would be grateful if some indication could be provided as to a timetable for an updated TAA and whether this would allow the Council sufficient time to identify additional sites prior to the examination and adoption of the plan. The concern being that the existing TAA is out of date, not reflecting the Government’s changes to the Planning Policy for Traveller Sites (August 2015). In addition, and notwithstanding the fact that the Draft Local Plan seeks to allocate more pitches and plots than is required, the concern is that based on the proposed allocations set in the Sites table on page 123 onwards, land designated as Green Belt is likely to be required to meet any further need. This could lead to a potential conflict with paragraph 83 of the NPPF (local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period) should an updated TAA not be forthcoming and, in the event that an updated TAA identifies a higher need than the surplus allocated.

- it would be useful for the Sites table on page 123 onwards to include information on the proposed allocation of pitches I plots for Gypsies, Travellers and Travelling Showpeople where this is part of a larger allocation I mixed-used development

For example, Site Allocation A24 Slyfield Area Regeneration Project. This will provide clarity to the overall numbers proposed to be allocated, their location and timeframe for delivery.

In addition to those points made previously, the Council would like to take this opportunity to raise two further points in regard to Policies S2 and H1 Homes for all; and the Sites listed in the Proposed Submission Plan.

1. Policy H1 states that Traveller accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need. The Council would therefore query why there is no mention of the provision of pitches I plots on Land to the south and east of Ash and Tongham (Policy A29). The site details show that this is a strategic location proposed for allocation with the provision of approximately 1200 homes. In accordance with Policy H1, four pitches or plots should be provided. If Guildford Borough Council considers that identified need has been met (despite not having an up to date assessment of need up to 2033), we would like to discuss the opportunity for some of our surplus need for Gypsy; Traveller; and Travelling Showpeople pitches I plots to be met across the Borough boundary in accordance with the Government's duty to cooperate.
1. There appears to be a potential discrepancy between the total number of pitches and plots being provided as set out in Policy S2 and within the Sites table on page 123. As noted above, Policy S2 identifies that 73 pitches are required between 2012 and 2027 and 8 pitches are required for Travelling Showpeople. However, the Sites table lists that 82 pitches and 20 plots are to be provided. Firstly, the Council would like some clarification as to these sets of figures. Secondly, should Guildford Borough Council be able to identify sufficient suitable, available, and achievable sites over the required figure both now and in the future, we would welcome the opportunity to discuss whether unmet need arising in Elmbridge Borough could be met through the preparation of the Guildford Local Plan in accordance with the Government's duty to cooperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10316  Respondent: 15502113 / Paul Gaffikin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10322  Respondent: 15502177 / Steve Plewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10410  Respondent: 15502209 / Shirley Atkinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These need to be revised downwards, possibly quite seriously.

The housing number is based on arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit reduced inflation number for housing needs. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinize

The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's DAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this DAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the DAN are identical because the DAN is "deliverable" and is by definition objective and cannot be contradicted. The DAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate.

This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the DAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% ADNB and about 75% protected by
SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10412  Respondent: 15502209 / Shirley Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.

The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The la11 appe1 s to 1'1a·1e seliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
I OBJECT to the Borough Wide Strategy.

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears thatGuildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit reduced inflation number for housing needs. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinize

The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's DAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this DAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the DAN are identical because the DAN is "deliverable" and is by definition objective and cannot be contradicted. The DAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and
local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate.

This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the DAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% ADNB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10414  **Respondent:** 15502241 / Richard Atkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.

The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The la11 appea1 s to 1'1a1e selibera1ly been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt.
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10331  Respondent: 15502305 / S. Gibbs  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10353  Respondent: 15502817 / Linda Margaret Cutbush  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. What plans are there for south of Guildford?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10364</th>
<th>Respondent: 15502977 / Alexandra Morton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10378</th>
<th>Respondent: 15503105 / Beml Evans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10395</th>
<th>Respondent: 15503169 / A Palitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
3. POLICY 2: BOROUGH WIDE STRATEGY

3.1 The Borough Wide Strategy identifies Guildford Borough Council’s housing target as 13,860 during the plan period (2013-2033). The Objectively Assessed Need (OAN) is therefore 693 dwellings per annum. This figure was confirmed as part of the West Surrey Strategic Housing Market Assessment (SHMA) The SHMA also included Waverley and Woking within the Housing Market Area (HMA). Policy 2 stated that the delivery of homes is expected to increase over this plan period due to the time lag associated with delivering infrastructure. This phasing of delivery has been set out in the table below:

Table 1: Proposed phased housing delivery in GBC from 2018-2032

3.2 GBC demonstrated an under delivery of net completions of housing delivery between 2010 and 2015 and have continuously failed to meet their current OAN of 693 dwellings per annum as well as the former lower interim housing target of 322 dwellings per annum.

Supporting Text

3.3 Paragraph 18 and 4.19 of the supporting text for policy S2 in the Proposed Submission document state that countryside beyond the Green Belt will be required in order to meet housing requirements:

‘4.1.8 ‘Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. These include:

- countryside beyond the Green Belt
- urban extensions to Guildford and Ash and Tongham
- new settlement at the former Wisley airfield
- development around villages (including some expansion).

4.1.9 These will be phased according to deliverability and identified need. We anticipate that smaller allocated sites will provide the majority of supply in the first five years. Larger development sites, including the strategic development sites, will deliver the majority of new development in the 6-10 and 11-15 year periods of the plan.’

3.4 The land at Fairlands can be demonstrated as deliverable and could come forward in the earlier years of the plans in order to assist in addressing the continuous under delivery of development that has been seen over the past 5 plus years. It is therefore considered that this site should be re-introduced to the Local Plan and be allocated for housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016-07-15 written reps to Proposed Submisison Local Plan HR FINAL.pdf (453 KB)
1.1 Guildford Borough Council (GBC) is producing a new Local Plan to cover the plan period 2013 to 2033 and guide development within the borough whilst also complying with the principles and wider national policies identified within the National Planning Policy Framework (NPPF).

1.2 These representations are made as part of the Regulation 19 to the public consultation for the Proposed Submission Local Plan.

1.3 The representations relate to Land to the west and south west of Fairlands – ‘Land adjoining Fairlands, Guildford’ which was identified in the former Draft Local Plan Document as a ‘safeguarded’ site under Site Allocation 118. The site has not been taken forward as an allocation in the Proposed Submission Local Plan.

1.4 This statement provides a site summary and a review of Policy 2 of the borough wide strategy. It then addresses reasons why the land at Fairlands should be allocated for housing development in the Submission version of the Local Plan, covering issues such as housing requirements, the 5 purposes of the Green Belt and the questionable deliverability of large scale strategic sites that have been included in the Proposed Submission Local Plan.

SITE SUMMARY

2.1 The land to the west and south west of Fairlands has been identified on the map

2.2 The land adjoining Fairlands, Guildford’ was identified in the former Draft Local Plan Document as Site Allocation 118.

2.3 The site was also identified in Volume III of the Green Belt and Countryside study as providing opportunities to accommodate development without significantly compromising the purposes of the Green Belt. The parcels of land identified as H8-A H8-B (former allocation 118) have a capacity of circa 500 dwellings. The site is well related to existing services such as a local service centre, a doctor’s surgery and bus routes located within Fairlands, which is a residential area in character. The site provides the opportunity for a natural extension to the residential area of Fairlands on a contained site which is surrounded by defensible boundaries and tree cover.

2.4 This site is deliverable and available now. It is within a single ownership and as it was last in agricultural and equestrian use there are no constraints to the site coming forward for residential development. The site is achievable, it is capable of being delivered within five years and is entirely viable.

2.5 Fairlands uniquely is capable of accommodating an on-site SANG to mitigate the impact of any development upon the Thames Basin Heaths SPA. The developable area is shown edged red on Image 1 and the proposed SANG land is edged blue and hatched. We have discussed this with Natural England who have advised that this could be bespoke SANG land to support the development.

2.6 There is an existing access to Littlefield Manor and the land shown hatched brown on Image 1 will be used as a principle access road to the development land from the A323 Aldershot Road.

2.7 Fairlands is a sustainable settlement, with a number of services including a school, doctor’s surgery, post office, community centre and shops. Fairlands is located just 2 miles from Guildford, providing access to a range of quality services and infrastructure. It is therefore a wholly sustainable location for development.

POLICY 2: BOROUGH WIDE STRATEGY

3.1 The Borough Wide Strategy identifies Guildford Borough Council’s housing target as 13,860 during the plan period (2013-2033). The Objectively Assessed Need (OAN) is therefore 693 dwellings per annum. This figure was confirmed as part of the West Surrey Strategic Housing Market Assessment (SHMA) 2015. The SHMA also included Waverley and Woking within the Housing Market Area (HMA). Policy 2 stated that the delivery of homes is expected to increase over...
this plan period due to the time lag associated with delivering infrastructure. This phasing of delivery has been set out in
the table below: <see attachments>

3.2 GBC demonstrated an under delivery of net completions of housing delivery between 2010 and 2015 and have
continuously failed to meet their current OAN of 693 dwellings per annum as well as the former lower interim housing
target of 322 dwellings per annum.

Supporting Text

3.3 Paragraph 4.18 and 4.19 of the supporting text for policy S2 in the Proposed Submission document state that
countryside beyond the Green Belt will be required in order to meet housing requirements:

‘4.18 ‘Whilst these sustainable locations are our preferred locations for new development, they are unable to
accommodate all of the new development we need. We will therefore release allocated land for development in other
areas. These include:
countryside beyond the Green Belt
urban extensions to Guildford and Ash and Tongham
new settlement at the former Wisley airfield
development around villages (including some expansion).

4.1.9 These will be phased according to deliverability and identified need. We anticipate that smaller allocated sites will
provide the majority of supply in the first five years. Larger development sites, including the strategic development sites,
will deliver the majority of new development in the 6-10 and 11-15 year periods of the plan.’

3.4 The land at Fairlands can be demonstrated as deliverable and could come forward in the earlier years of the plans in
order to assist in addressing the continuous under delivery of development that has been seen over the past 5 plus years. It
is therefore considered that this site should be re-introduced to the Local Plan and be allocated for housing development.

HOUSING LAND SUPPLY

Annual Monitoring Report

4.1 The recent Annual Monitoring Report (AMR) published in October 2015 to assess the period of 2014-2015 showed
that net completions that year had been just 242. This is an under delivery of 80 dwellings against the interim housing
figure and an under delivery of 451 units when assessed against the annual housing target for the plan period identified in
the Proposed Submission Local Plan. The previous interim housing figure of 322 dwellings per annum agreed on May
2012 did not take account of up to date assessments of housing need and therefore was not NPPF compliant. The phased
delivery of housing proposed will further exacerbate this issue.

4.2 The AMR states that ‘housing provision is currently restricted by the lack of available and deliverable development
land in the borough….delivery rate is only likely to increase when larger areas of land are suitable and available for
development’. This demonstrates the need in the district for large scale strategic sites such as the land adjoining
Fairlands. These representations therefore identify the key reasons why the site should be considered appropriate for
housing and should be reinstated in the Local Plan for removal from the Green Belt. Paragraph 83 of the NPPF addresses
removal of land from the Green Belt and states that boundaries ‘should only be altered in exceptional circumstance’. The
current under delivery of housing is considered to be an exceptional circumstance and as a result Green Belt land such as
the site at Fairlands should continue to be considered as an allocation site in the final Local Plan.

5 Year Housing Land Supply

4.3 The NPPF addresses the matter of housing land supplies in Paragraph 47 which stipulates a requirement for Local
Planning Authorities (LPA) to “identify and update annually a supply of specific deliverable sites sufficient to provide
five years worth of housing against their housing requirements with an additional buffer of 5%.” It goes on to state that
where there has been persistent under-delivery of housing in the district or borough, LPAs should increase the buffer to 20%. It is clear that GBC cannot currently demonstrate a 5 year housing land supply with in the region of only 1.4-2.5 years supply being currently identifiable. This will continue to be the case if GBC adopt the phased process identified in table 1 of this report.

4.4 The level of under delivery of housing is also likely to perpetuate as inward migration from the London Boroughs continues. Much of the SHMA is based on figures from 2012 which are now out of date and no longer accord with the population projections supplied by the Office of National Statistics (ONS) which show that by 2037, the population of Surrey is expected to increase by over 200,000.

4.5 It is therefore considered essential that previously identified deliverable sites, such as the land at Fairlands are included in the final Local Plan document as development allocations.

DELIVERABILITY OF STRATEGIC SITES

5.1 GBC anticipates that there are a number of sites within Guildford that can come forward within either 5 or 11–15 years. Whilst there may be a number of sites within the settlement that could be capable of coming forward, Slyfield Area Regeneration and Wisley Airfield have been identified as being unlikely to be in a position to meet the criteria of being either deliverable or developable.

Slyfield Area Regeneration Site Allocation A24

5.2 Slyfield is identified as a major development site with the capacity of accommodating 1,000 residential units as well as other infrastructure on a wider mixed use site. This site is occupied by a number of existing uses including a waste transfer station and a large sewage treatment works operated by Thames Water. The treatment works currently process effluent from Guildford, Godalming, Cranleigh and surrounding villages and is clearly required for this function.

5.3 There is limited evidence that the replacement of the treatment works is supported by Thames Water and that this is desirable, deliverable or viable. The sewage treatment works would require a significant cordon sanitaire in order to ensure that the residential amenity of future occupiers is protected. It is our experience that this is likely to sterilise much of the developable area of the site and would be required regardless of whether the works is relocated or remains in situ. Given the size and nature of the sewage treatment works a cordon sanitaire of c.300-400 metres around the treatment works is likely. The need for a significant cordon sanitaire around the sewage treatment works does not appear to have been acknowledged, nor has the need for support from Thames Water and Surrey County Council for the proposals.

5.4 It is noted that GBC envisages this site coming forward within the 11-15 year period.

However, there is no evidence that there will be a reasonable prospect that this site will come forward for residential development or that the site is capable of accommodating the quantum of development envisaged given the need for a cordon sanitaire and the need to accommodate a number of competing uses identified for the site, including an 11 hectare site allocated for a waste facility in the Surrey Council Waste Plan, 2008. This allocation of 1000 units is a development commitment for a significant amount of the site. There is no evidence that the site is viable given that the proposed allocation includes a number of municipal facilities including: a new waste management depot, 11 hectares of waste facilities (an allocation in the Surrey Waste Plan, 2008), a new sewage treatment works and a primary school.

5.5 Indeed given that the site is only 40 hectares and over one quarter is allocated for waste facilities, in order to accommodate the proposed quantum of uses and the amount of residential development the resulting density would need to be in excess of 50 dwellings per hectare which would not be desirable in terms of the character of the area.

5.6 In the light of the considerable constraints that this site experiences it should not be relied upon to deliver the proposed 1,000 dwellings identified at allocation A24.

Wisley Airfield Allocation Site A35

5.7 This proposed redevelopment site would provide 2,000 new homes as part of a larger mixed use site. There are however significant concern that this site is unsuitable in planning terms, particularly regarding the strategic highway network.
5.8 The NPPF is clear that plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The site is manifestly not sustainable, it is not related to any existing settlement or infrastructure or local services. Indeed it is located in open countryside, remote from any settlement infrastructure. Development of this site would constitute a major housing development in a rural area which will rely upon car based travel to and from given the proposed access on to the A3 which is not conducive to encouraging modal shift to non-car based transport.

5.9 The inherently unsustainable location of this site means that its development as a major housing and employment site will conflict with the policies of the Framework. An Inspector will have to give very careful consideration as to whether it constitutes the most suitable location for the proposed form of development. The site is also the most contentious proposed allocation in GBC’s plan. Its suitability for major development will need to be very carefully scrutinised.

5.10 In the light of the potential deliverability issues displayed by some of the most significant strategic sites identified in the Plan, as well as GBC requiring yet further sites to meet its OAN of 693 dwellings per annum, there is no justification to not consider the land at Fairlands for development. The site is suitable, available and deliverable now.

GREENBELT

6.1 The key restriction regarding the development of the land at Fairlands site is its Green Belt location. There are 5 purposes to the Green Belt which have been set out below in relation to this proposed allocation site.

To check the unrestricted sprawl of large built-up areas

6.2 The land to the west and south west of Fairlands adjoins the settlement of Fairlands, 2.6 miles north of Guildford. The western boundary of the site is constrained by the existing development of Littlefield Manor, including Littlefield Manor Riding School and the extent of the flat, developable area of land. The northern boundary is heavily wooded between the site and the Aldershot Road. The eastern boundary is formed of residential streets. The southern boundary is restricted by an existing track and an established row of clustered mature trees. The site is therefore largely contained, and the less defined boundaries to the south and west could be strengthened through additional soft landscaping. It is therefore considered that this site is not required to be in the Green Belt in order to prevent the village from sprawling.

To prevent neighbouring towns merging into one another

6.3 The proposed extension to Fairlands would be to the west of the settlement. The nearest development to the west is a row of housing along Frog Row Lane. This is 1.2km from the existing western boundary of Fairlands and would still be 1km away should the site subject of this report be developed. The nearest village to the west is Willey Green which is 2km west of Fairlands. It is therefore considered that there is no risk of the proposed development of the site resulting in neighbouring settlements merging together.

To assist in safeguarding the countryside from encroachment

6.4 As set out in the two points above, the site is largely contained by existing development and mature woodland and vegetation. Development of the site would allow for a sustainable extension to an existing settlement.

To preserve the setting and special character of historic towns

6.5 Fairlands is not considered to have any special or historic character. The settlement was first built in the 1930’s with the majority of development taking place in 1960’s. The settlement is not considered to contribute to the setting of any nearby historic towns and therefore does not meet this purpose for land being within the Green Belt.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.6 The West Surrey SHMA found that the objectively assessed need was 1,729 homes per annum for the region between 2013 and 2033, 693 of which are to be provided within the Guildford local planning area per annum. It is therefore necessary for the Local Planning Authority to consider a range of sites, both brownfield and green field. Of course brown field sites should be developed first, however the Council has recognised that the existing available brown field sites within the area are not sufficient to meet current housing requirements. There is therefore a clear indication that the
Council will need to identify Greenfield land, much of which will be Green Belt if it is to meet housing requirements. In addition, Policy 2 of the Borough Wide Strategy clearly indicates that Green Belt land will need to be released for development in order to meet the OANs for the borough. On this basis there is a strong case for this identified site to be removed from the Green Belt to allow for beneficial development.

CONCLUSION

7.1 It is acknowledged by GBC that it does not have a five year land supply against the OAN target of 693 dwellings per annum. This is exacerbated by a continuous under delivery of development in recent years, as well as the proposed phased approach taken by GBC to backtrack the housing delivery to the later part of the plan period.

7.2 There is an evident housing shortage in the borough in the immediate term and a reliance upon some sites which have serious deliverability constraints has the propensity to exacerbate this deficit. In addition, the Local Plan recognises that Green Belt land will need to be developed in order to meet the OANs for the borough. In light of this, there is no rationale for the removal of Fairlands Land from the Local Plan as a former proposed allocation site. The land is available and deliverable, and capable of assisting in meeting the current pressing housing need, particularly as the former proposed allocation removed the site from the Green Belt.

7.3 GBC has identified at least two major strategic sites which are anticipated to deliver circa 3,000 dwellings to assist in meeting the 693 dwelling per annum figure, that have significant deliverability problems. Simultaneously GBC has removed the land at Fairlands which is capable of delivering circa 500 dwellings if released from the Green Belt as previously proposed in the Draft Local Plan. On this basis, the land to the west and south west of Fairlands should be allocated as a development site to assist in meeting the borough’s OAN and allowed to provide certainty in the event that any of the currently identified sites fail to come forward.

7.4 There can be no justification for an authority which has an immediate housing deficit, a lack of genuinely deliverable sites and Green Belt constraints to backload such significant proportions of projected housing delivery to the later stages of the plan period. Land adjoining Fairlands had previously been identified as suitable for release from the Green Belt, it is available and it is deliverable now. The site should, therefore, be introduced as an allocation for residential development during the current plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- [2016-07-15 written reps to Proposed Submission Local Plan HR FINAL.pdf](#) (462 KB)
- [2016-07-18 GBC re reps HR-CW.pdf](#) (245 KB)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10437</th>
<th>Respondent: 15503617 / Stephen Roy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10449</th>
<th>Respondent: 15503649 / N Ord</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10453</th>
<th>Respondent: 15503777 / Elya Koudou</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10464</th>
<th>Respondent: 15503809 / M Pratt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO the disproportionate amount of development in one area of the Borough. 36% of the proposed housing (5500 homes) is allocated along a short stretch of the A3 from Wisley to Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10490</th>
<th>Respondent: 15503969 / Katy Denham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Housing

I object to all policies based on your housing figures, which I believe are too high even before the Brexit vote which should take them down further. Also my councillor tells me that the calculation of those figures has not been explained even to him! How can that be right? Housing policy should be based on real and understandable housing NEED for borough residents, restricted necessarily by the requirement to preserve the Green Belt boundary. I further object to a Plan which requires 70% of housing to be built on the Green Belt.

Brownfield land - empty shops, unused railway land, - is available in the town centre. I expected you to really work hard to develop policies which require the use of urban brownfield sites first and to seek out those sites, which I believe can cope with real housing and commercial need and I object to your policies which do not do this (Policies H1,H2). The need for shopping and commercial space is declining with current retail trends and Guildford town centre should be revitalised with more town centre housing than is proposed. (Objection to policy E7).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16324</th>
<th>Respondent: 15503969 / Katy Denham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Your proposed housing numbers of 13,860 are too high. The figures seem to be subject to serious doubt, as will be detailed by groups representing the interests of borough residents such as the East Horsley Action Group, which I support and others. I therefore object to all policies based on your housing figures until such figures are no longer in doubt.

Brownfield land is available in the town centre. I would direct you to the open letter and brownfield site assessment sent to GBC councillors by Guildford Green Belt Group. I call on you to develop policies which require the use of urban brownfield sites first, which I believe can cope with real housing and commercial need and I object to your policies in this matter. Guildford town centre is the only place in the region with any requirement for redevelopment, but that should be undertaken within existing buildings, where retail developments are no longer viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10504  Respondent: 15504001 / Margaret Banks  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new
housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10586  Respondent: 15504129 / Simon Hurdle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough wide strategy

I object – The calculation that 13,860 homes are required is based on a calculation made by a sub-contractor who will not share the basis of the calculation, citing commercial confidentiality. Wrong in principle – government should be open and transparent; important data should be open to give public confidence that it is accurate, based on sound assumptions, and free of commercial bias.

In 2014, the House of Commons and Local Gov. C’tee was critical of the accuracy of SHMA processes; it noted cases where two independent calculations yielded different results. Their report concluded (Section 69), “Communities need to have confidence that the figures on which their local plans are based are accurate. There can be little reassurance about the SHMAs when two assessments of the same area, ...... produce very different results.”

The method of calculating the population of a town with many foreign students also distorts the population total.

The Employment Land Needs Assessment 2015 indicates that Guildford does not need a large increase in employment space, which suggests that such housing as is needed could largely be built on Brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10626  Respondent: 15504577 / Indigo Planning Limited (Michael Wood)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Submitted on behalf of Kitewood Estates Ltd

Policy S2: Borough Wide Strategy

- As noted above, we are generally supportive of the council’s approach to housing delivery, though believe the target will need to increase in order to meet up-to-date

- To accord with Paragraph 182 of the NPPF, and for the Plan to truly be positively prepared, Policy S2 should be re-worded so it makes provision for “at least” the identified A caveat should then be included to begin an early review of the Plan if housing requirements change, for example if neighbouring authorities are unable to meet their own housing needs.

- We also object to the proposed phasing of the annual housing target as set out in Policy The phasing of the housing targets will result in the Council failing to meet its housing requirements until 2022.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10692 Respondent: 15504929 / William Scott Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, we are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities. On MY community!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10693 Respondent: 15504993 / Harry Eke Agent:
I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Borough Wide Strategy (Policy S2)
All the other Borough Councils in Surrey are at odds with GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure. This must be addressed.

There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). Only 11% of the existing housing is in this area but 36% of all the Plan’s new housing is proposed here. Even with the overall figure being reduced, the Plan should be more balanced across the borough.

Comment ID: PSLPP16/10722  Respondent: 15505313 / Samantha J S Perry  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
If 5,036 houses are built between the M25 and Burpham (about 5 miles), it will inevitably lead to a merging urbanisation of identities of the villages. This is unacceptable!

It is common sense that new development should be in urban areas where there is already sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10730  **Respondent:** 15505377 / Simon Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10734  **Respondent:** 15505409 / Ian Cunningham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/10738  **Respondent:** 15505537 / Vincent Carley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10777</th>
<th>Respondent:</th>
<th>15506049 / Mandy Shoesmith</th>
<th>Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10798</th>
<th>Respondent:</th>
<th>15506177 / Jean Calas-Hathaway</th>
<th>Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10791</th>
<th>Respondent:</th>
<th>15506241 / Penny Whitlock</th>
<th>Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Please consider these following objections to the local plan. I would hold you answerable to all these objections. How can you justify this when so many long term vacant properties are in the Guildford borough? People have moved here due to its village not suburban feel.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10809</th>
<th>Respondent:</th>
<th>15506465 / Lisa Garner</th>
<th>Agent:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10807  Respondent: 15506497 / James Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2) All the other Borough Councils in Surrey are at odds with Guildfords proposal and this must be addressed. The plan should also balance development proportionally across the borough, it should not all be focused on Wisley / A3. Clearly, any new development should be in should be in urban areas where there is already sustainable transport. There are more than enough brownfield sites that should be developed for the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10826  Respondent: 15506625 / Ian Toft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10866  Respondent: 15506657 / Teresa Laroche  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10856  Respondent: 15506785 / Maverick Hornblow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10876  Respondent: 15506881 / Chloe Brown  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10881  Respondent: 15506913 / Nicholas Mann  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10897  Respondent: 15507457 / Andre Rose  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10902  Respondent: 15507489 / K Garner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10934  Respondent: 15507553 / David Lawton Garner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10949</th>
<th>Respondent: 15507585 / Patrick Laroche</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10970</th>
<th>Respondent: 15507617 / Ewan Collens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10973</th>
<th>Respondent: 15507649 / Nick Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td><em>The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.</em></td>
<td></td>
</tr>
<tr>
<td></td>
<td><em>It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.</em></td>
<td></td>
</tr>
<tr>
<td></td>
<td><em>Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river.</em></td>
<td></td>
</tr>
</tbody>
</table>

---

Section page number: 1387 of 1722  
Document page number: 2088
surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. It would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

I object to all Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11046  Respondent: 15508385 / Susan Woodman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing our future generations.

There is a disproportionate level of development in one area of the Borough.

Expansion should be constrained to protect the character of town and country in our congested gap town.

The consultation period is limited in time. I believe the Local Plan should be presented properly at public consultations and the feedback taken on board because I don’t see that it has been to date.

Tunnelling of the A3 should be agreed before Gosden Hill is planned for development.

Transport evidence is not yet fit for use and major transport issues are unresolved e.g. another river crossing, a central bus facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2552  Respondent: 15508385 / Susan Woodman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

You are trying to build far too many houses in Guildford. I know more housing is needed but they need to be of the right type with affordable ones for first time buyers. Where do your figures come from? We do not need nearly 14,000 new homes in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11058  Respondent: 15508961 / Abby Allen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I am concerned that the proposed increase in households in the Horsleys is 35% which is greater than any other area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11070  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposals to build 13,860 new homes the bulk of these on the green belt.

The number is based on pre-Brexit projections for economic and population growth, including migration. There is already softening of the housing market with Property Company shares falling these numbers now need to be revised downwards, possibly quite seriously.

The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work in London a short commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; Where as half the people who work in Guildford live outside the borough. This so called HMA nothing more than a bit of fiction dreamt up by the planners as a way to try and concrete over a large area of green belt. The HMA for an area that is part of the London commuter belt fails to follow that of a self contained town such Exeter, Taunton etc.

Guildford is part of a far wider and more complex housing market. These concerns regards the HMA have been raised before but the council has ignored it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11071  Respondent: 15509057 / Richard Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The need for the 13,860 properties seems to bear no relation ship to the population forecast produced by the Office of National Statistics (ONS) these show the general level of population in Guildford Borough will stay fairly static (births = deaths) with the exception of students, which could well change with Brexit, with these being at the university, surely it would make far more sense to replace the proposed 48,000 m2 of additional retail space with accommodation more suitable for young couples and students, The changes in the retail world with the growth of online shopping has already brought about the demise of a number of stores of the type that would use shopping malls/centers and this will develop
even more during the period of this local plan. Additional retail space would be very negative on the traditional shopping areas such as the High Street and North Street.

The university should also be provided student accommodation this would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on require their university to accommodate far more students than Guildford. Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

Justin Gardner Consulting Ltd, who produced this HMA have got there figures totally wrong. I would suggest the ONS figures are closer to reality especial with Brexit on the horizon, given that Justin’s Gardners web site shows they mainly work for developers, I would suggest what they have produced in short is a developers charter. Or possible they are trying to create a new town called Wokeford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11113  Respondent: 15568353 / Thomas Mountford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

To whom it may concern,

This email is to formally register my objection to the Guildford Local Plan 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11129  Respondent: 15568993 / Jim Edgington  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Please hear my objection to the local town plan. I feel Surrey University is not playing it part in the community and putting pressure on housing. They failed to deliver the student housing that they promised back in 2003 and in recent times the students have been feeling the negative effects of this. It’s not good looking back at the estate that I grew up on and seeing it almost lost to student housing. As for the town centre there are plenty of brown field sites being ignored in favour of retail property. Do we need 40% more shops, when more and more of us are turning to the online shop?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I write to object to the current Local Plan proposals and endorse the Guildford Residents Association rejection of expanding housing in Guildford so dramatically. There is no realistic justification for such an increase in housing for the people currently dwelling in Guildford.

In the last 30 years of living in Guildford, I have seen the continual approval of piecemeal speculative developments of ever increasing. In that time no serious strategic plan to improve the local infrastructure has been made to cope. Therefore the traffic congestion, and associated dangerous pollution, has steadily eroded the quality of living in the town. To embark on a further massive expansion in housing with no improvement to the A3, no solution to the new northsouth route through Guildford, and no additional crossing of the river Wey in the town centre, is irresponsible. We are still (just) proud of our town but are already living with the chronic failure of the Planning Department to actually plan ahead. This draft Local Plan must be radically improved and any substantial new development made conditional upon prior infrastructure improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO the disproportionate amount of development in one area of the Borough

I OBJECT TO the limited consultation period

I OBJECT TO the last minute inclusion of new sites with less than 2 weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11168  Respondent: 15569505 / David Hawkey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO THE 2016 DRAFT LOCAL PLAN s2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11165  Respondent: 15569569 / Sethulekshmy Nair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Impact on the community

The pressure for housing is obvious throughout the South East. With seemingly no national strategy, in an expensive area like Guildford will probably go the same way as an expensive area, like mine, in Camberley. There will be unrelenting demand from relatively well-off buyers from London. The housing density will increase. Absolute limits are needed to stop the villages turning into suburbia. The plan simply does not respect the character of the area.

The planned increase in housing in the villages seems out of balance when compared to larger towns and even urban London. The plan will wither away village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11226  Respondent: 15570049 / Faith McCarthy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to say that I oppose the expansion of Guildford into the green belt surrounding the town and I support the well thought through opposition to the proposals that have been submitted by Guildford Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11229  Respondent: 15570113 / John Griffiths  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I Object in the strongest possible terms to the Guildford Borough Council Draft Local Plan to 14,000 new homes with 70% on Green Belt, despite promises to protect it in last year's elections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11235  Respondent: 15570145 / Owen Eszeki  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11240  Respondent: 15570209 / Emily Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11264  Respondent: 15570273 / Barnaby Geib  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11301  Respondent: 15570305 / Richard Gray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11306  Respondent: 15570337 / Ann Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We are dismayed to find that GBC is planning to build several hundreds of houses on green belt and farmland close to our homes. The traffic will increase exponentially along these country lanes and we will lose the green and pleasant atmosphere that we currently enjoy. Please reconsider more brown field sites and land closer to the centre of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Comment ID: PSLPP16/11343
- Respondent: 15570817 / Tom Edelsten
- Agent: 15570817

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial
statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11357  Respondent: 15570977 / Mark Negus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. We simply do not have the infrastructure and are physically constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15276  Respondent: 15571201 / Zoe Dudgeon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived
from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S2 –Borough Wide Strategy - I OBJECT.

I have 4 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration.
2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. “West Surrey” is clearly far too small.
3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.
4. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaims their pro-development agenda. External experts and members of the public have provided detailed critiques of the model. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

POLICY S2 –Spatial Development Strategy

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly...
proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

1. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “West Surrey” is much too small. Half of Guildford Borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The OAN/housing number of 13860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken - this is not a sustainable strategy.
1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. There will be a significant increase in traffic flows along the A247 through West Clandon, funneling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge will be built on Green Belt land which was zoned to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11793  Respondent: 15571617 / Bruce Garbutt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In outline I object to the number of houses being built in a relatively small part of the borough. I object to large parts of the green belt being built upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2622  Respondent: 15571617 / Bruce Garbutt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the SHMA on the basis that the revised population figures on which the whole plan is based are flawed. I object therefore to the figures and their validity.

a) Any basic education in statistical analysis would always warn against the perils of using an analysis over a short time period being used to produce projections over a long period. This appears to be precisely what has been done for the basic population forecast for this plan. The revised figures are therefore inherently unreliable.

b) This inflated forecast suggests that a positive policy of encouraging growth in excess of long term trends is still being used although this still does not appear to be explicitly stated anywhere as an actual policy. The principal problems for me as a resident of Guildford concern the general inadequacy of the local infrastructure to cope with what exists today. The A3 is regularly now at a standstill for no reason other than the general weight of traffic; doctor and hospital services are overloaded, public transport outside the central conurbation is generally non-existent or incapable of meeting the
needs of the current population trying to live at the 21st century pace of life. I object strongly therefore to any suggestion (stated or implied) of an intentional “go-for-growth-in-population” policy.

c) This version of the Plan does include more information than the previous version regarding the modelling assumptions and also the model structures; however full disclosure has still not been made. Given that the organisation that produced the revised forecast has commercial links to housing developers (as their website states, “We act for many of the leading developers and are currently advising on schemes totalling over 3m sq ft. We have a team of over 100 people directly involved in the development sector.”), I object strongly that all such assumptions and model constructs are still not clearly visible to the public so that we can be satisfied that no undue developmental influence has been exerted on the results in areas where modelling detail has been produced, it is obvious that sections of the calculations have been based upon different originating data and assumptions thereby making the overall calculations erroneous, false and inaccurate. I object therefore that no credence can be put on the overall results given this basic statistical invalidity.

I object to the scale of the overall developments proposed. The above problems in the population numbers directly challenge the necessity for the scale and number of many of the developments proposed in the plan. As a result, revised developments proposed are of a scale not in keeping with the environment in which we live and wish to maintain. I object that the new results of the SHMA have been used unchanged by any practical constraints being applied.

- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford.
- This local plan has completely ignored these factors by using the raw SHMA figures for detailed planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3237  Respondent: 15571617 / Bruce Garbutt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the dominance of the A3 corridor developments.

a) Following the removal of the originally proposed developments in Normandy, the revised figures show an even more disproportionate amount of development proposed along the A3 in the north east of the Borough - large housing at Gosden Hill, Garlick’s Arch and Wisley Airfield amongst others.

b) These areas will effectively be providing dormitory accommodation either for Guildford or London. Residents in these areas would be relying almost exclusively for daily access and travel along the already over-congested A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11519  Respondent: 15571681 / Anne Martin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s ‘need’. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I notice no where in the plan do you mention the population per sq km for Surrey as it is and will be and compare that with other counties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11616</th>
<th>Respondent: 15572353 / Dianne Kashel</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Surrey is an attractive, green leafy place to live in which of course makes it very popular. Excessive development will transform this haven for the worse and it will eventually just become another suburb of London. I hope these plans can be modified so that the impact is less destructive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11623</th>
<th>Respondent: 15572801 / Kathy Kirk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I strongly object to Guildford Councils plans to build so many homes on the Green Belt. It will irreversibly spoil what is currently an incredibly beautiful part of our English Countryside. I urge that these plans be reviewed and be significantly watered down or abandoned altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11664</th>
<th>Respondent: 15573921 / Carolyne Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11733  Respondent: 15574337 / Jacqueline Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11801  Respondent: 15574945 / Tim Crook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11816  Respondent: 15575009 / Tony Redknap  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. What is the robust rationale for this?
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and
26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced and detrimental. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough. The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11923</th>
<th><strong>Respondent:</strong> 15577569 / Linda Koscia</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the disproportionate amount of development in one area of the borough</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the limited consultation period</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the last minute inclusion of the new sites with less than 2 weeks notice</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11931</th>
<th><strong>Respondent:</strong> 15577665 / Grant Angus</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the Borough Wide strategy on the basis that the number of homes is unsuitable and the green belt protections are not being respected in my view.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11935</th>
<th><strong>Respondent:</strong> 15577793 / Susan Hughes</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the disproportionate amount of development in one area of the borough.</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
</tr>
</tbody>
</table>
In addition to the excessive plans, there are no constraints or attempts to limit development. I understand that the plan proposes enlarged village boundaries – for no reason other than the potential further development of land.

The plans will cause irrevocably damage our environment and our Green Belt, for little benefit: I doubt the need for so much development. There is no satisfactory plan for appropriate infrastructure. The plans are excessive and without constraint.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11972   Respondent: 15578369 / Chris Corbould  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I appreciate that a lot of work has gone into this local plan but I AM TOTALLY OPPOSED TO BUILDING ANY HOUSES ON GREEN BELT LAND.

This land needs to be preserved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11973   Respondent: 15578433 / Sari Negus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/11974   Respondent: 15578465 / Jan Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Firstly, I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. There is flawed evidence exaggerating the need for expansion, as shown clearly by the GRA report on housing, furthermore, expansion should be limited to protect the character of town and country in our congested gap town. It is unacceptable that, unlike other towns, Guildford is choosing not to constrain its overall housing growth – why is this?

I would beg you to reconsider your proposals and reduce the expansion of Guildford to an acceptable, practical level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12000  Respondent: 15578753 / Andrew Needham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Brownfield opportunities are being ignored, or assigned elsewhere – we need more homes in the town centre (not 40% more shops), and much more accommodation on campus for students, and homes for the elderly to free up family houses. The University needs to build the student accommodation it promised in 2003. The University impact needs to be allowed for and managed in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12003  Respondent: 15578753 / Andrew Needham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There has been no consultation with local residential bodies such as Resident Associations or Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12017  Respondent: 15578977 / Norman Evans  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Guildford Borough Council’s Local Plan on the grounds that it represents serious over development, is based on inaccurate, unscrutinised housing figures, and means a massive, unacceptable destruction of Green Belt land. It would also require a huge amount of infrastructure and attract thousands of extra vehicles, placing undue pressure on local road networks, as well as causing extra pollution.

Furthermore, it would completely change the character of the borough, harm the environment and seriously damage the quality of life for residents. As our local MP has said, the Plan is ‘not fit for purpose’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12034  Respondent: 15579137  Nicodemus Brian Rhyner  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12044  Respondent: 15579361  Caroline May  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also object to the inflated number of new houses in the plan even with better infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLP16/12190  **Respondent:** 15581761 / Peter Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

---

Page 1420 of 1722
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12259  Respondent: 15582017 / Valerie Lewis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the erosion of green belt included in every case in the local draft plan despite election pledges by both government and local councillors. GBC has not made enough effort to utilise brownfield sites. Developers must be queuing up to use the green belt sites they have been buying up. In the newspaper yesterday an article reads ‘Mrs May has already referenced the “need to do far more to get more houses build” and arrest the decline of home ownership, but she has also ruled out any changes to the green belt.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12262  Respondent: 15582017 / Valerie Lewis  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object that GBC is creating towns at Wisley and Burpham, 2000 houses at each site, and 1850 at Blackwell Farm. Far too high a density of traffic onto the A3 which is already gridlocked at certain times of the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12298  Respondent: 15582337 / Peter Hill  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportional amount of development in one area of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12338  **Respondent:** 15582593 / Dermot McMullan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

---

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I doubt the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale
of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. The Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand.

The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12357  Respondent: 15582593 / Dermot McMullan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable
roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12399</th>
<th>Respondent:</th>
<th>15583169 / Poul Jensen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new
housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12408  Respondent: 15583201 / M.J Ryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I do not believe an adequate case has been made out for an extra 13,000 homes to be built in the Borough over the next 17yrs or so. Much of the supporting data, hidden from public scrutiny and possibly produced by consultants with a vested interest in the building industry, seems to be based on anticipated growth using questionable figures which are perhaps even more questionable given the recent Brexit referendum, viz. if the UK goes into recession mid-way into such a large building project the town will end up looking a mess! (Just look at what happened in the Republic of Ireland post the 2008 global financial crash!).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12411  Respondent: 15583201 / M.J Ryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I urge Guildford Borough Council to reconsider their Local Plan taking into consideration my objections and, if necessary, for the Government Planning Inspector to rigorously examine every detail of the Plan and to do everything possible to protect the Green Belt and our already hard pressed communities from over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12434  Respondent: 15583361 / Pat Moxon  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12437  Respondent: 15583393 / Jane Buckingham  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12442  Respondent: 15583521 / Richard Moxon  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
</tbody>
</table>

- **Section 4 - POLICY S2 – BOROUGH WIDE STRATEGY (Objection)**
  - The target of 13,860 homes is higher than the 2014 plan’s 13,040 target. Alarming, considering the high objections to this figure in the 2014 public consultation. Again, the source data and calculations have not been released to public scrutiny and green belt constraints have not been applied in reducing targets. This should be rectified.
  - Table 1 in 4.1.13 confirms that new green belt development forms a high proportion of development. Despite section 3.2 stating a preference for brownfield development there is no category within the table clarifying how this is being applied. The vision itself is not being applied to each policy consistently.
  - The original intent of the green belt was a permanent feature, not a reservoir for development. Adoption of unfeasible targets to justify the need for development replicates the flawed agenda of the Green Belt and Countryside Study (GBCS).

The Brexit decision has surely rendered previously calculated targets out of date. The targets require reassessment with urgency and cannot be adopted without question under the new circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. **I object to the Borough Wide Strategy (Policy S2)**

   GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan isn't balanced across the borough; there’s far too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will of course lead to a merging urbanisation of identities the villages.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12508</th>
<th>Respondent:</th>
<th>15583841 / Catherine Young</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages, and I OBJECT to this number proposed.

A number of reports have been produced independently from GBC (one by the Guildford Residents Association GRA, and one by one of our local Ward Councillors that clearly show the number of houses planned for each year (693) is far too high, and does not take into account the way numbers are affected and inflated by Guildford’s migratory student population. Neither does it factor in any possible changes to the population growth if Britain was to leave the EU, which indeed it has. There should have been some allowance built in for this.

I strongly OBJECT to fact that the method used by GL Hearn to identify the number of new homes required remains out of the public domain – this to me is a serious with holding of information which makes the whole draft Local Plan unsubstantiated, if not just plainly incorrect!

In addition, the proposed expansion of West Horsley is unsustainable, and I therefore OBJECT to Policy S1. The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West and East Horsley or neighboring villages, so why are so many homes planned for this area? Who is going to live in them? Why are the urban areas not being developed proportionally? It just doesn’t make sense.

I do believe there is a case for some low cost housing to keep some people in the village, but I see no sense in re-locating those already struggling to find housing/employment in other areas of the borough and placing them in a situation which makes getting a job harder because of access to employment or transport links. I believe it could become a sink estate for people being moved out of the metropolitan area. The West Horsley Parish Council and Surrey Community Action Housing Survey (May 2014) identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish to downsize to a smaller home- which in turn would free up larger family homes and allow flow in the property market. This should be taken into consideration, and it has not!

‘Affordable’ homes, under national definitions, mean homes that are sold or rented at 80% of market value. Even at 70% as proposed these homes would be well out of the reach of most people’s means and starter homes will still not be available to local people. Please look at the average cost of housing in this area and hopefully it will become clear eventually to GBC that young people and the elderly are never going to be able to afford what would be classed as an ‘affordable’ home in this area. It was reported last year in the Daily telegraph that the average cost of a home in East Horsley, our neighboring village, was £1.5 million! In the road that I live in, a ¾ bedroom semi- detached home sold for £550,000 October 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12517</th>
<th>Respondent: 15583937 / Brian Astley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the 2016 draft local plan on the following grounds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-the disproportionate amount of development in one area of the Borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12519</th>
<th>Respondent: 15583969 / Tim Key</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand that some change is inevitable, but do not believe that the proposals provide the kind of change that is actually needed and instead will do irrevocable damage and set a course for further substantial developments. More than anything, I believe that green belt lands should be protected and treated as such.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I hope you will take my opinions into consideration.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12525</th>
<th>Respondent: 15584033 / Andrew Hutton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The size and scale of the New Local Plan 2016 will overwhelm the Horsleys. Is such a dramatic proposal being put forward for the parish of Ash ??</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This Plan is without foundation and should be thrown out immediately</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12544</th>
<th>Respondent: 15584065 / Amy Gervasio</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the amount of development that is happening in the Send/Ripley/Wisley/Burpham areas and doubt that this amount of development is actually needed. The SHMA report now states that there is massive demand for new housing, double the amount quoted in previous plans, but the Council will not publish the report so how do we know if this figure is accurate or overstated?!

I OBJECT to the wider borough plan – there’s too much development in the north-east of the borough (Wisley, Ripley/Send/Clandon). A third of the whole Local Plan’s new housing is in this area which only has a tenth of the existing housing. It is unbalanced and will ruin the feel of the villages which will become merged in a long sprawl of development along the A3 from the M25.

I want these objections to be presented to the Planning Inspector. Please send me confirmation that you have received this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12554  Respondent: 15584097 / George Gervasio  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the amount of development planned in the north east of the borough. It is impossible to know whether or not the proposed amount of housing need is correct, as the SHMA report has been withheld from public view by the GBC. Surely this course of action by the GBC is underhand, if not unlawful? Perhaps we do need 600+ houses a year, twice the amount quoted in previous plans, but without the proof, we cannot be sure and this leaves a bad taste in the mouth!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12556  Respondent: 15584161 / Alexandra Elson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12591  Respondent: 15584481 / Jeremy Hamilton  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12621  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15663  Respondent: 15584641 / Miriam Gilkerson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I object to the disproportionate amount development in one area of the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12634  Respondent: 15584833 / Maria Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle,
Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/12649  **Respondent:** 15584961 / Helen Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

1. POLICY S2

I object to the Borough Wide Strategy (Policy S2 as this is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite significantly.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri- borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. Guildford is in the London commuter belt and part of a far wider and more complex housing market. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise.

The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial as are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents...
are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability. The Plan also ignores the fact that many of those working in the area live elsewhere, as my husband who runs an accountancy practice in Guildford Town Centre knows first-hand. Accordingly in considering the housing number

the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have been deliberately manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocations of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. This is completely unbalanced and does not reflect the current spread of housing across the borough. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, and checking the unrestricted sprawl of large built up areas and preventing neighbouring towns from merging into one another.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12685  Respondent: 15585121 / Dave Cress  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object very strongly to the UNSUSTAINABLE, based on FLAWED DATA
draft Local plan june 2016

I support the Guildfords Residents Association response and am opposed to Guildford expanding by a quarter.

No exceptional circumstances to allow Unnecessary Development have been shown by Borough Council to warrant the 2000 houses and traveller sites being built on Gosden Hill Farm. This Green Belt land should be saved, the A3 4 way junction and possible tunnel entrance should be decided first.

It is unsound for many reasons stated by the GRA response. The too high figures from SHMA must be reduced to Waverley and Woking councils reductions levels AT LEAST. Guildfords report on housing figures is UNSOUND,

As GBC did not properly account for how the reports figures were arrived at, and too short a period of consultation was given the Draft Local plan is unaccountable and therefore UNSOUND.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12695  Respondent: 15585249 / Joe Eke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---
- I OBJECT to the inflated demand for housing in Send and Ripley. The total of 13,860 houses in the local plan is exaggerated. Even with a population growth of 20,000 in the plan period, based on a supposition of 2.5 people per home, the number should be no more than 8000 and if it goes ahead Send and Ripley will become a conurbation of Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12700</th>
<th>Respondent: 15585313 / Kim Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO – The disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12705</th>
<th>Respondent: 15585313 / Kim Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I also object the the failure of GBC to identify sufficient brownfield sites within the urban area, which should be targeted first before the green belt is even considered. There is land available at Slyfield for further commercial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15941</th>
<th>Respondent: 15585345 / Wanita Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO – the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLP171/2112</th>
<th>Respondent:</th>
<th>15585345 / Wanita Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object to the hiding of development by “deferment” (A24, A25, A26, A43)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12720</th>
<th>Respondent:</th>
<th>15585409 / Vanessa Styles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT TO – the disproportionate amount of development in one area of the Borough.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/12723</th>
<th>Respondent:</th>
<th>15585441 / Laurie Will</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. <strong>I OBJECT to the Borough Wide Strategy (Policy S2)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
“West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey.
Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12783  Respondent: 15585665 / Sophie Thompson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12794  Respondent: 15585793 / Mark Horigan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP16/12822</td>
<td>15585889 / Tony Rodnight</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Guildford Council has failed to place constraints on overall housing growth, unlike other councils

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP16/12824</td>
<td>15585889 / Tony Rodnight</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

ignoring Brownfield sites which could be used for student accommodation and new homes for the elderly

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPP16/12914</td>
<td>15586017 / C Maslin</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN ‘objectively assessed need’ figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. ‘It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.’

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development ‘because of the environmental constraints which exist in the County, including Green Belt’. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled ‘A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford’. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
• There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

• The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:
1. ‘the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt’ - Nick Boles to Sir Paul Beresford MP 7th February 2014.

1. ‘we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt’ – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

2. ‘Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt’ – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, ‘We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.’ I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. These developments place a disproportionate burden on the north east of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/12883  Respondent: 15587105 / John Downes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy S2

- This states, “Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate).” As previously stated, why do we have to focus on growth? A better strategy for the residents of Guildford, as evinced by the number of protests about this and the previous version of the Plan, is containing and maximising what we have.

- “There will also be opportunities for rural exception sites which are small-scale developments providing affordable homes in locations where new homes would not usually be appropriate”. The Plan gives no reason why these sites should now be regarded as unexceptional. It is a deliberate move to make the numbers up at whatever cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Growth

One of the key themes of the Plan is that is seeks to stimulate economic growth and retain Guildford’s economic competitiveness with other towns. It is this very adherence to the growth mantra that has caused the town’s problems:

- the transport infrastructure is creaking because there are so many people trying to get in and out of the town. This will only be exacerbated by building more out-of-town housing complexes;

- housing is in short supply because the town has had a policy of attracting more and more businesses, thereby increasing demand for more homes;

- skilled labour is in short supply because we have attracted these same businesses;

- there is a tacit acceptance that because people want to live here, we have to accede to that demand.

We are a prosperous town with what we have. We do not need to grow in order to retain that prosperity. Guildford will always be popular, for its historic interest, quality of housing, surrounding countryside and, as far is business is
concerned, its affluent population. Growth simply leads to urban sprawl and the merging of unique areas – and, in Guildford borough’s case, these are unique historical areas.

Rather than expand the University of Surrey Research Park, the land should be used for the housing that will, under GBC’s plans, be placed in the Green Belt.

Guildford’s aim should be to be the best at what it is or already has. Better housing, better facilities, better research facilities, better education, better care, and a better environment for its population (not a gradually worsening environment through the Plan proposals). These should be the guiding principles. Guildford should not succumb to pressure from developers whose only interest is profit.

**Brexit**

The Plan is pre-Brexit. The Surrey Advertiser tells me that the SHMA will be looked at in the light of Brexit. But it also quotes Cllr Spooner saying, “we will revisit both the SHMA and the employment land needs assessment (ELNA) prior to the submission of the local plan to the secretary of state”. If this consideration changes the SHMA and, therefore, the ONA, it must surely change the whole basis of the Plan. People have already commented on the proposals based on pre-Brexit figures and assertions. Everyone who comments on the Plan will have to do so before any re-assessment is made. Morally, politically and practically, GBC cannot submit the Plan to the Secretary of State without receiving the views of the Guildford residents and its organisations in the light of these latest developments.

**SHMA/ONA**

It is completely undemocratic that the SHMA is not available for scrutiny. How could GBC enter into a contract where it is unable to assess the validity of the assumptions and calculations that are built into one of the most important calculations that affects Guildford’s citizens? How am I to know whether the calculations are skewed in some way – particularly towards the desires of developers.

All other views I have seen regarding the ONA, at 693, condemn it as ludicrously high. Independent research is casting significant doubt over this figure. It needs to be re-assessed in the light of this research (and the Brexit considerations) and a revised Plan needs to be re-submitted to the public for comment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/317</th>
<th>Respondent:</th>
<th>15587649 / James Masterman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Infrastructure plans lack ANY certainty, rendering the planning base naive at best, catastrophic at worse.

The figure 13893 new dwellings over the planning period has been challenged down to as law as a real need for only 7676 new dwellings. The former lacks any credibility especially in the light of the councils continuing refusal to share its planning models assumptions and inputs.

This remains a plan without need, credibility and at great local social, health and economic cost. 7 to 8000 dwellings will be more than sufficient over the plan period - concentrate on that and the infrastructure to support it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13102</th>
<th>Respondent:</th>
<th>15587905 / Clare Claxton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13135</th>
<th>Respondent:</th>
<th>15588001 / Mary Jane Godfrey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/13146  **Respondent:** 15588065 / Nick Claxton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/13163  **Respondent:** 15588673 / Joy Davis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The scale of development proposed to the east of Guildford is disproportionate to that proposed for the rest of the borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/13172  **Respondent:** 15588801 / Elizabeth Adams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The scale of development proposed to the east of Guildford is disproportionate to that proposed for the rest of the borough

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Policy S2: Borough Wide Strategy

I OBJECT to this policy as I believe the figures used to calculate GBC’s annual housing target are incorrect.

The policy is based upon a projected net increase of 25% in the housing stock of Guildford Borough over the period 2013-2033.

However the Office of National Statistics (ONS) projects a 15% increase in population over the same period.

In addition the West Surrey Strategic Housing Market Assessment, (“SHMA”), seems to be based on miscalculation. It estimates that 517 homes per annum arise from ‘the demographic starting point’. This is effectively what (ONS) and the Department of Communities and Local Government (“DCLG”) predict GBC will require based upon their population and household forecasts. It then adds

- 120 homes per annum in order to ‘support economic growth’
- 31 homes per annum to ‘improve affordability’ and
- 25 homes per annum due to ‘student growth’

This increases the original per annum figure of 517 new homes by 176 to reach the 693 annual housing target.

I would have thought that economic growth is already factored into the statistics produced by ONS and DCLG.

Further the GBC Affordable Housing Policy H2 proposes that all but the very smallest development sites must have 40% of their homes offered as affordable housing. Surely these would already be included in the 517 homes proposed.

It appears therefore that what GBC is proposing is actually in excess of the official household growth forecasts for the borough.

Furthermore I believe that the annual target needs to be recalculated in view of the decision of the UK to leave the EU. Both the government and Bank of England forecast that economic growth will be reduced. This must bring into question the number of homes added to the ONS/DCLG figures.

The National Planning Policy Framework (NPPF), paragraph 158, requires GBC to base its development plan policies on up-to-date and relevant evidence. I believe it can be seen from the above that this is not the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13214  Respondent: 15588897 / John Attridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Guildford Borough Council’s proposal for 13,860 new houses, without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. The Plan is unbalanced across the borough; with too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]) where 36% of all the Plan’s new housing is proposed for this area, which has only 11% of the existing housing. 5,036 houses are proposed between the M25 and Burpham, which will obviously lead to a merging urbanisation and the loss of identities for the villages concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13297  Respondent: 15589825 / Ann Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Re the plans, I am writing to say that I support the GRA’s response in objecting to the expansion of Guildford by 25%- a ridiculously high percentage which will spoil/ ruin the character of the town.

In particular I object to:

plans to use green belt land when there are brownfield sites available especially in the centre- people do not want to live in a town totally given over to retail.

a lack of proper sustainable transport exacerbated by an excessive number of new homes creating yet more and more vehicles on already crowded roads

These plans strike me as ones developed by businesses likely to benefit- construction etc etc and not for the people of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13298  Respondent: 15589857 / Louise Herbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I write to formally object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and will be of even greater detriment to our neighbouring villages of West Clandon, Ripley, West Horsley and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

- I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds: Firstly these housing numbers have been imposed with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic
development plan on which there was no consultation. This policy and its excessive housing forecasts will turn Guildford into a dormitory town for London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13299  Respondent: 15589857 / Louise Herbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13301  Respondent: 15589889 / Keith Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The Borough Wide Strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall Housing Figure, which would be more reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing Number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing Number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West. All of these lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so, therefore, are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites of over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13361  Respondent: 15590241 / Claire Tallis  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

I object to the Borough Wide Strategy (Policy S2)  
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.  
The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.  
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

---

Comment ID: PSLPP16/13369  Respondent: 15590273 / Eunja Madge  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

---
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I support the Guildfords Residents Association response and am opposed to Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14420  Respondent: 15590529 / Linda Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Having been made aware of your plans for this area for the future I am so disappointed that you as professionals seem to have planned for a nightmare scenario for this area. You have a duty to those who live within your boundaries to present us with sensible and strategic decisions in your local plan. You have done neither and Instead presented us with a plan that seems greedy in the extreme, threatens to destroy our village life and that takes no consideration of conservation of our precious surrey flora and fauna.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14422  Respondent: 15590529 / Linda Mumford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I strongly object to the high number of houses intended for this area which is currently small villages connected by narrow country roads which are already overloaded, poor quality and impossible now to walk down safely. Trying to keep abreast of what Guildford’s intention is for the area requires an eye for attention to detail. Developments come and go and some are slipped in at the last moment to confuse and baffle us.

Come on Guildford you can do better than this, you have a duty to your residents to present us with sensible plans and not ones that seem to have been drawn up on the back of a cigarette packet to meet targets. If your local plan was marked it would get a FAIL from me. Give us something that doesn’t ruin the area with overdevelopment because you are too lazy or lacking in imagination to present something better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13458  Respondent: 15590593 / Johnathan Page  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly to the unsustainable Draft Local Plan 2016, which is based on flawed data.

I support the Guildford Residents’ Association (GRA) response to the Draft Local Plan 2016 and am opposed to Guildford expanding by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13581  Respondent: 15593633 / Ila-Maria Patermann  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We particularly object to the allocation of land to the strategic sites of Garlicks Arch (Ripley/Send border), Gosden Hill (Clandon) and Wisley Airfield, which we believe will have a particularly bad impact on the communities and wildlife in the area.

We also think that proposing the erection of more than 6,500 houses between the M25 and Burpham is a shocking idea as it will create an even bigger traffic problem for me commuting in and out of Guildford. The sheer size of this proposal is disproportionate and unfair to the people in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13630  Respondent: 15593729 / Martin Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13631  Respondent: 15593761 / Celestyn Kwapisiewicz  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13657  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13722  Respondent: 15594817 / Toni Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43)and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13658  Respondent: 15594849 / Andrew Thomas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13664  Respondent: 15594849 / Andrew Thomas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13668  Respondent: 15594945 / Sally Thomas  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13669</th>
<th>Respondent: 15594945 / Sally Thomas</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

· The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13680</th>
<th>Respondent: 15595137 / Sheila Keogh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

· We object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15267</th>
<th>Respondent: 15595169 / Christina Barbara O'Shaughnessy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I believe the Council's proposals to be deeply flawed and seriously detrimental to Guildford and the surrounding areas, particularly Burpham and Merrow.

To introduce such a disproportionate volume of new housing without first tackling the already severe traffic problems in the area is totally irresponsible and seriously questionable. This is putting the horse before the cart and puts the local area under such intense pressure such that will adversely affect all residents, old and new.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13763  Respondent: 15595489 / Michael Crates  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

3. I object to any further degradation of roads caused by increased traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13766  Respondent: 15595489 / Michael Crates  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

6. I object to the congestion caused on the A3 and M25 trunk road
7. I object to the increased congestion on the local village roads and lanes
8. I Object to the Unsuitability of our local roads for heavy vehicles and more traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
15. I object to Sites being planned in unsustainable locations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13780  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the Borough Wide Strategy (Policy S2)

The strategy proposes that 13,860 houses are developed across the borough but does not apply any constraints to reduce the overall housing figure. This is different to all other Borough Councils in Surrey.

The strategy in the plan suggests a disproportionate amount of development in the north east of the borough with the inclusion of the Former Wisley Airfield A35, Garlick's Arch A43 and Gosden Hill A25 as three huge residential sites. These sites are in Wards that currently represent 11% of the housing in the borough, due to their rural nature, but these Wards would have to bear 36% of all the new housing. The rural nature of these areas would be lost with the urbanisation and this would permanently destroy the communities. This is a very unbalanced plan which does not reflect the current housing spread in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13782  Respondent: 15595553 / Carol Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to the lack of identified brownfield sites in the Plan

GBC have failed to identify enough brownfield sites for development with the urban area. These should be used for development before the destruction of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/13789  Respondent: 15595585 / Tim Wiggins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the Borough Wide Strategy as GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPP16/13794  Respondent: 15595681 / Willemien Downes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are...
being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13843  Respondent: 15596545 / Nye Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the proposed developments around and between villages in the current Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13846  Respondent: 15596609 / Della Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object strongly to the proposed developments around and between villages in the current Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13867  Respondent: 15596833 / Brian Alexander  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I understand the area needs to produce more housing stock, but the amount you are expecting this area to manage is totally disproportionate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/13892</th>
<th><strong>Respondent:</strong> 15598113 / David J. Blackbourn</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Strategic Policies:** The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 “Sustainability” and Policy S2 “Housing number”.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/13915</th>
<th><strong>Respondent:</strong> 15598241 / Madeleine Hewish</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:  PSLPP16/13967</th>
<th><strong>Respondent:</strong> 15598721 / Trevor Ottaway</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14019</th>
<th><strong>Respondent:</strong> 15599329 / Luke Attfield</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>There has already been a lot of new building in this village and there is no reason for more houses to be built in the locality as it is already full.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14050</th>
<th><strong>Respondent:</strong> 15601057 / Chris Vinall</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objections to specific policies and matters within the Plan. In particular, I am greatly dismayed by the extent to which this version of the Local Plan is the same or worse than the version on which the previous consultation exercise was conducted. This rather makes a mockery of the use of the word ‘consultation’, making it seem merely a legal box-ticking exercise. I remember the arguments in favour of the previous plan being adopted were mainly that it was preferable to set our own plan than have on imposed on us by central government. I note that this argument is not being used this time, presumably because it is no longer valid, the government and the economic situation in which it operates have changed enormously. Yet no alternative compelling argument has been advanced in favour of a vast increase in development of the area.</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14083</th>
<th><strong>Respondent:</strong> 15601121 / Elspeth Anderson</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
</tbody>
</table>
I object to the Borough Wide Strategy (Policy S2)
The borough wide strategy is not well thought through. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14116  Respondent: 15601185 / Jane Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model...
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new
housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14114  Respondent: 15601249 / Ann Barrass  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s...
OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging
of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14190  Respondent: 15601409 / Adam Wheeler  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that we have been given very little time to digest what the planners have put forward, and put forward our thoughts on the proposals!

I object to the council viewing our villages as the answer to the housing needs of the area. The transport links from Send and Ripley are poor to say the least. The buses run once an hour, so without a car to get to a railway station, or towns such as Woking or Guildford would be very difficult. So how are all these new home owners going to get to work as with the increased traffic no one would get anywhere there'd be total chaos!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14192  Respondent: 15601409 / Adam Wheeler  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I know I am one of many residents who has raised concerns over what is proposed, I do hope that you will listen to our objections, and see that what you have put forward is totally impractical and threatens to change the whole local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14195  Respondent: 15601473 / Joseph Fort  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2). The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14242  Respondent: 15601857 / Martin Billard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14255  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14305</th>
<th>Respondent:</th>
<th>15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA.

It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”.

It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic analysis.
projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA.

The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including
for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” – Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.

Exceptional circumstances need to be shown to adjust boundaries.Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).Constraints should be applied to the Objectively Assessed Housing Need (OAN).

However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly, the overall number of new homes proposed across the borough seems grossly inflated to me, not reflecting projected population growth or demand. I am sure that, post-Brexit, the Borough Council would want to take time in reassessing many of their growth assumptions, which seemed flawed even before the Referendum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14356  Respondent: 15602401 / Ian Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The above principle reasons are - in my view - sufficiently fundamental to undermine the integrity and adequacy of the current Proposed Submission Local Plan.

Detailed proposals within the plan - particularly including the proposed housing development of Land at the site of the former Wisley Airfield - therefore lack foundation, and if permitted to proceed will have unpredictable and irreversible effects upon the character and viability of the area as a functioning and stable community. I therefore STRONGLY OBJECT to these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14384  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14385  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16249  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16252  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14402  Respondent: 15602561 / Jonathan Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14424  Respondent: 15602625 / Margaret Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14438  Respondent: 15602817 / Paul Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards
represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14614  Respondent: 15603905 / Michael Douek  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14656  Respondent: 15604289 / Lesley Pitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

2. POLICY S2
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly,
the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is
no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more
complex housing market. 3 These concerns have been raised since 2014 but the Council has failed to seek better market
data. There was no public consultation on the SHMA and Councillors were not
allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is
artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it
appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban
neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other
districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an
inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been
scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used
in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by
consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the
figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that
almost every element of the plan is predicated on this OAN, the plan as a whole cannot be
considered “sound”. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the
OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN
is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial
statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or
other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the
rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because
developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit
levels have been more important. The plan cannot be considered “deliverable”. In addition, the number of homes
proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many
homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is
hard to see how anything else can
be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into
account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a
baseline figure and should not be passed off as a policy proposal. It is unreasonable to embark on a radical transformation
of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from
development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing
the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a
largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the
onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on
Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

4
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices
or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live
elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s
commuter belt, demand for housing is, in practical terms, unlimited. This policy does not take proper accounts of the
constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe
the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this.
This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated
towards a growth agenda without
disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and
through increasing the housing density of existing built up urban areas.
The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable
development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the

local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough. The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14666</th>
<th>Respondent: 15604499 / Annabel Curling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14716  **Respondent:** 15606561 / Rebecca Warwick  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14717  **Respondent:** 15606593 / James Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/14718  **Respondent:** 15606625 / Rebecca Sear-George  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

"I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14719  **Respondent:** 15606657 / Kim Hopwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

"I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14797  **Respondent:** 15607425 / Louise Quy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

"Guildford Borough Council's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from the plans of all the other Borough Councils in Surrey.

The Plan shows great imbalance across the borough with too much development in the North-East of the borough (Wisley A35), Ripley/Send (A43) and Clandon (A25) - a staggering 36% of all the Plan's new housing is proposed in this area which currently has only 11% of the existing housing.

I am very concerned that 5,036 new houses proposed between the M25 and Burpham (a distance of about 5 miles in total) will obviously lead to merged urbanisations that will engulf our villages and wipe away our identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?"
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. It is plainly hopelessly cobbled together and misplaced on many levels.

It will ruin many local villages and lose some of our precious Green Belt which is meant to be sacred for very good reasons. Once built upon there will be no going back!

I set out below my objections to specific policies and matters within the Plan.

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model
are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14822  Respondent: 15607681 / Robin Hopwood  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14832  Respondent: 15607937 / Joanna Kaminska-Hine  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the size of the proposed developments at your strategic sites of Wisley airfield, Garlicks Arch and Gosden Hill because all of these sites are bigger than the villages that are established and they will overshadow them.

I understand that some development is required but it should be in proportion to surrounding established villages to complement and improve instead of overdeveloping the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to your allocation of a large portion of housing development within a small geographical area of the borough. Focusing on only producing large sites with the sole purpose of making it easier for the developer should not be the basis for planning permission approval. Consideration should be given to the location of any site greater than one hundred houses as the local transport infrastructure is incapable of absorbing the increased demand.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**I OBJECT to the Borough Wide Strategy (Policy S2)**

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work...
elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14906  **Respondent:** 15608801 / Beth Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

My main objection is one of principle to the proposed building over of valuable greenbelt land, especially when it consists of farmland or woodland. Once built upon it can never be replaced. Future generations will not thank us for facilitating the spread of urban sprawl. And I also object to landowners converting such farmland/woodland to uses such as golf courses (having been refused planning permission for housing) in the hope that they will subsequently, eventually, get such permission - I am thinking of the example of Clandon Golf course outside Merrow, which has never built a club house or made any great efforts to be a profitable golf course.

Secondly, as a long term resident of West Clandon, I am worried about the effects this plan will have upon traffic volumes through our village both from the point of view of road safety on the A247 (a well documented problem) and with a view to air quality concerns. The A247 is already very busy and too narrow for some of the vehicles using it.

Thirdly, as a resident of Guildford, I object to a Local Plan based upon a housing requirement derived from assumptions which have not been clearly explained via a process that is not clear. I suspect that the housing number is overstated and that we really need more smaller homes in existing town centres (i.e near shops/transport links/local jobs), rather than the larger more profitable homes the builders would prefer to build on greenfield sites.
Lastly, I object to having to repeatedly object to much the same Local Plan as last time around despite the numerous objections made then.

I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14908</th>
<th>Respondent:</th>
<th>15608801 / Beth Fuller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14944  Respondent: 15609057 / Julian Long  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council having not followed the correct process. Since 2014 GBC has changed every major site in Send proposed for development, and have now added a massive major new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185, and has now gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut of regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14976  Respondent: 15609377 / Joe Hayman-Joyce  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am emailing to object to the GBC plan as it is currently framed because I do not believe the strategy and sites as a whole to be sound. As a local resident, I am particularly concerned about the plan to build 2,000 houses on the Gosden Hill Farm site. This development impacts on all policies (except for numbers 5, 9 and 11) detailed in the Evidence Base. Although Guildford needs more schools and housing, it first urgently needs an effective approach to traffic management through the town and the A3. The Plan fails in its Duty to provide a sound solution to the traffic problems that will follow from another 2,000 houses and associated cars in the Clandon/Burpham area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14977  Respondent: 15609377 / Joe Hayman-Joyce  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
According to the most recent ONS Neighbourhood Statistics, Burpham contains 2,425 dwellings. The proposed development on Gosden Hill represents an enormous increase of **82.5%** in the number of dwellings which will inevitably have an impact on a wide environment. It is the duty of GBC to manage that impact effectively and appropriately. Quite apart from the destruction of green-belt land and village character of the neighbourhood, and, notwithstanding the massively increased pressure on provision of adequate water, sewage and power services, the impact on road transport will be unbearable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14985  **Respondent:** 15609473 / Ed Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

It is essential that the assumptions underlying the stated need for nearly 14,000 additional homes are transparent and open to scrutiny. These assumptions should now be reviewed in the light of the outcome of the Referendum on leaving the EU as this could well reduce the demand for homes in commuter towns. The document emphasises the need for homes for all and to have homes that are flexible to meet changing needs but how this will be achieved is not explained.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15087  **Respondent:** 15610113 / Paul Mullarkey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

It seems to me that Guildford is using this plan to identify all potential greenfield sights in this plan and leaving nothing to future generations- a flawed policy. We should be exploring the use of brownfield site and looking at the housing stock that is actually needed. The entire student population can and should be accommodated on the Campus site leaving large amounts of housing available for rental in the town. Allowing homes for the elderly will potentially free up family houses and at the same time address the growing problems of isolation in old age in Guildford and surrounding areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15114  **Respondent:** 15610433 / Clare Porter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

---
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough. There is far too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15234  **Respondent:** 15611105 / Ramsey Shubbar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15233</th>
<th><strong>Respondent:</strong> 15611137 / Scott Hutchinson</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15232</th>
<th><strong>Respondent:</strong> 15611201 / Jed Alexander</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15277</th>
<th><strong>Respondent:</strong> 15612481 / Gillian Culmer</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15386  Respondent: 15614209 / John Finch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15387  **Respondent:** 15614241 / Jane Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15402  **Respondent:** 15614497 / Hannah Yandle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.
I OBJECT TO POLICY S2 (BOROUGHWIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15427  Respondent: 15614721 / Charles Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.
The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15463  Respondent: 15614721 / Charles Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15428  Respondent: 15614753 / Anthony McCulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas. The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15430  Respondent: 15614817 / Jan Pearson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15466  Respondent: 15614817 / Jan Pearson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15431  Respondent: 15615233 / Gareth Nassh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15433</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed sites are neither adequate nor viable for building in such a huge capacity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15434</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed sites are neither adequate nor viable for building in such a huge capacity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15469</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16916</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

... 

The roads approaching the A3/M25 Junctions are already gridlocked and could therefore not possibly cope with any additional traffic, obviously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15494  Respondent: 15615745 / Nicholas Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to register my strong objection to the draft local plan and in particular its approach to the concept of sustainable development. In my opinion the plan's definition of what is sustainable is miles away from any reasonable interpretation of the term.

Attached is a more detailed response.

I have no doubt that you will have received many similar ones, written with encouragement of protest groups. Given the huge size of the document, the complexities involved, and how busy people's lives are these days, that is hardly surprising. But I would urge you strongly not to try to dismiss my, or anyone else's, response on those grounds. I have taken a great deal of time to read through the suggested submissions in detail, have many numerous changes to them to reflect my particular concerns and have removed sections that I do not agree with.

Please note, for example, that contrary to other objectors, I support policy H1 as regards travellers' sites. The proposal strikes me as sensible and I believe that other objectors are influenced by negative prejudices about travellers as people rather than a properly considered response to the development and planning issues that are involved.

I would urge you to bear this explanation in mind when dealing with my remaining objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15546  Respondent: 15616929 / Nigel Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/ Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLP16/15593  **Respondent:** 15617185 / Michelle Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/ Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLP16/15616  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

** I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15615</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA.

It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done.
The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:-

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly uneven distribution is unexplained.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaims their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15692  Respondent: 15619041 / Jack Cross  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are far in excess of those in Woking and Waverly. I object these figures were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18687  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2: Borough Wide Strategy

The West Surrey SHMA found that the housing shortfall in the borough was much greater than expected. It concluded that:

“Taking account of these adjusted household formation rates for younger households and adjustment for student growth, the SHMA draws the following conclusions on the overall need for housing across the HMA to be at 1,729 dwellings per annum with need in Guildford at 693 dpa.”

To make up for this shortfall, the plan makes provision for 13,860 new homes which would average 924 dwellings per annum. This is a higher level of development than experienced in Guildford borough during the previous Local Plan period and higher than the assessed need to build flexibility into the plan. The Annual Housing Targets set within this policy average out over the 15 year period at the required 693dpa but delivery is back-loaded to the latter years of the plan. Over the first five years a target of just 2,950 has been set which equates to a delivery of 590dpa. This is considerably less than the assessed need and therefore contrary to the requirements set out in paragraphs 47 to 49 of the NPPF.

We consider that to comply with the requirements for a deliverable five year supply of housing land, the Council should promote additional sustainable smaller sites on the edges of existing settlements that would be deliverable in years one to five of the Local Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15731  Respondent: 15623425 / Jean Davy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
**I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment – SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt.”

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years,
the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA.

The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration.

These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including
for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 201470%

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.

Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and
irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the number of houses proposed. 13,860 houses will have a devastating effect on local communities. In an already traffic sensitive area due to the situation near the junction of A 3 and M 25 and with no train station or frequent bus service, the increase in use of cars would not only result in further congestion but also in severe air pollution in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15927</th>
<th>Respondent: 15627105 / Julia McClung</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15931</th>
<th>Respondent: 15627137 / Katie McClung</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15936</th>
<th>Respondent: 15627265 / Rachel McClung</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the proposals relating to the number of new houses and the density of such housing.

The housing numbers proposed across the borough are for 13,800 homes over the Plan Period to 2031. This number is too high and unsustainable in Guildford’s villages. The model used to calculate the number has not been seen or the assumptions tested by the Council or any of its officers. It has been, on numerous occasions, shown to be flawed by various third parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

In West Horsley, the 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the village. For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15961</th>
<th>Respondent: 15627809 / Fazia Cater</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

The Plan is not ready for an inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1755</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent: Vail Williams LLP (James Williams)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

Vail Williams is instructed by Surrey County Council (SCC) Property to make representations on the Guildford Borough Council (GBC) Proposed Submission Local Plan, June 2017. Previous engagement with the Local Plan process has included site specific comments, these representations focus on the main strategic issues, but refer to particular sites where referenced.

**Spatial Development Strategy (Policy S2)**

One of the fundamental changes to the Proposed Submission Local Plan is within Policy S2 relating to the Spatial Development Strategy. This includes both the level of housing provision over the whole plan period and also the annual housing target, which has been staggered to increase over the plan period.

Paragraph 4.1.9a states that the increasing annual target has been staggered due to the “the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of the necessary infrastructure expected to occur towards the end of the plan period”. Whilst Surrey County Council is fully supportive of delivering necessary infrastructure to support development and local communities, it recognises the necessity to provide sufficient housing to meet the needs of residents within Surrey. The revised phasing of annual housing targets places a greater emphasis on delivery at the end of the plan period, potentially leading to greater need in the short term due to the lower anticipated delivery rates early in the plan. It is considered that options to bring forward planned development earlier within the plan period should be fully explored to seek to provide a consistent level of housing delivery, recognising the National Planning Policy Framework (NPPF) aim to deliver housing especially within the shorter term. This is acknowledged by GBC, including in paragraph 4.1.10 that the phased approach, which is related to assumptions on likely rate of delivery, does “not in any way preclude the earlier delivery of the site where this is sustainable to do so”.

Page 1537 of 1722
Economy and Infrastructure

Associated with the level of housing, is the forecast for economic growth within Guildford Borough. Policy E1, relating to employment needs, sets out the delivery of employment floor space and land over the plan period. As part of sustainable development, as defined by the National Planning Policy Framework (NPPF), the provision of adequate employment land is supported to ensure the three strands of sustainable development can be incorporated within the wider plan objectives.

The Local Plan recognises (paragraph 2.10a) the pressure on existing infrastructure and the importance of providing sufficient infrastructure to support new development and the local community, which SCC Property support

Environment

Surrey County Council recognises the benefit of the countryside, including its uses for recreation. The protection of Areas of Outstanding Natural Beauty, Areas of Great Landscape Values, the Greenbelt, and the Special Protection Areas is supported, in accordance with current national guidance.

Summary

In conclusion, the plan seeks to balance housing delivery, economic development and the protection of the environment to accord with national guidance. However, appropriate consideration needs to be given to the wider housing market area.

SCC property support much needed housing and infrastructure development within the Borough and have particular site specific comments as above.

We welcome the opportunity to discuss any issues further, including any details relating to SCC sites that have previously been provided to Guildford Borough Council. Please ensure we are kept informed of all progress of the Local Plan and we request a place at the Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3481  Respondent: 15629633 / Wokingham Borough Council (Clare Thurston)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

That development proposed through the Guildford Borough Council Proposed Submission Local Plan document has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

Wokingham Borough Council submit an objection to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document on the basis of:
1. Failure under the duty to cooperate to achieve the necessary cooperation on the strategic cross boundary matter of meeting housing needs.
2. Failure of the plan to consider the likely unmet need arising from elsewhere in the Housing Market Area.

Wokingham Borough Council had previously responded to Guildford Borough Council’s Proposed Submission consultation stage of their Local Plan: Strategy and Sites. At that stage Guildford had finalised the West Surrey Strategic Housing Market Assessment (SHMA), had an identified housing need and had planned to meet this need within the borough. Guildford are now running a further Proposed Submission consultation, following key changes to policies which were
deemed to be significant, rather than merely minor modifications. Guildford are still planning to meet their housing need, however there are concerns regarding further unmet need within the West Surrey HMA and beyond.

The report outlines Wokingham Borough Council’s concern regarding likely unmet housing need arising from Woking Borough and Surrey Heath Borough Councils, which is not appropriately dealt with in the plan.

Background

Guildford Borough Council previously consulted on their Proposed Submission Local Plan: Strategy and Sites from 6 June until 18 July 2016. This Strategy and Sites document is the first document of two, which sets the vision, aims and strategy for the Borough up to 2033. Following adoption of this, a second document will be produced on development management policies. In October 2015 the West Surrey Strategic Housing Market Assessment (SHMA) was published. This indicated that Guildford Borough lies within the West Surrey housing market area with the boroughs of Woking and Waverley.

The SHMA recognised there is a strong relationship between West Surrey housing market area and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Guildford Borough. Guildford Borough Council has now published an update to the Proposed Submission document.

Consultation runs between 9 June and 24 July 2017. This includes policy changes which are deemed to be significant as well as minor modifications. There is also an updated evidence base, which includes an update to the West Surrey SHMA: the Guildford Addendum Report 2017. This SHMA update takes into account the latest population and household projections, mid-year population estimates and the economic projections which have been updated in light of the decision for the UK to leave the European Union. This update identifies a lower Objectively Assessed housing Need for Guildford Borough.

With known issues of unmet housing need in Surrey Heath, it is important for Wokingham Borough Council to ascertain whether the West Surrey HMA is seeking to meet need within the HMA and how the Surrey authorities are engaging given the strong links between their areas.

Analysis of Issues

The update to the West Surrey SHMA: Guildford Addendum Report 2017 identifies a change in housing need in Guildford from 13,860 new homes 2013 to 2033, to 12,426 new homes 2015 to 2034. The Guildford Proposed Submission Local Plan demonstrates that Guildford Borough Council will meet its entire proposed housing requirement of the plan period. The Strategic Housing and Economic Land Availability Assessment (SHELAA) identifies provision for delivery of 13,581 new homes, giving a 1,155 buffer to allow flexibility for delivery. Guildford state that this buffer cannot be used to meet unmet need in other areas.

Guildford Borough is within an HMA with Waverley and Woking Boroughs. Waverley Borough Council propose through their new local plan to meet their own housing need within the borough. Woking are currently unable to meet their housing need, with an existing shortfall of 3,150 homes 2013 to 2027. Woking are currently undertaking aSite Allocations DPD, however this has been delayed and creates uncertainty as to whether housing need will be met within the borough. Guildford Borough Council state in their Duty to Cooperate Statement that they have not been formally asked by Woking to accommodate any unmet need.

Failure to accommodate unmet need in the West Surrey HMA means that neighbouring authorities may have to consider delivering further new homes. To the north is the HMA consisting of Hart, Rushmoor and Surrey Heath Borough Councils. It is known that Surrey Heath have indicated that they are unable to meet their housing need and Hart and Rushmoor Borough Councils are only proposing to meet their own housing needs.

It is evidence that unmet housing need may arise from the Western Surrey HMA, and the adjoining Hart, Rushmoor and Surrey Heath HMA to which there are strong links. Seeking positive opportunities to meet needs in full is a central element of the National Planning Policy Framework (NPPF).
Notwithstanding the Guildford Proposed Submission Local Plan seeking to meet the housing needs arising from their authority’s areas, the plan does not consider the likelihood of unmet needs from elsewhere in the HMA, specifically Woking. Further it does not consider the unmet need arising from the adjoining HMA from Surrey Heath Borough Council. This is a major failing of the plan itself and in the outcome of engagement between the three authorities in the HMA.

Notwithstanding the above, Guildford Borough Council should also be mindful of the White Paper “Fixing our broken housing market” (February 2017) which proposes a standardised methodology for assessing housing needs. It will be necessary for Guildford Borough Council and the other authorities within the HMA to reconsider the level of housing need in the near future.

In summary, although Guildford Borough Council intend to meet the contribution to wider housing needs the needs of the wider HMA are not addressed. In light of this it is not considered that the Duty to Cooperate has been complied with or that the plan is justified and effective, the result being that it is unsound. Guildford Borough Council should work with Waverley and Woking Boroughs to positively seek opportunities to meet development needs in full.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION
The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

How much will it Cost/ (Save)
Is there sufficient funding – if not quantify the Shortfall N/A
Revenue or Capital? N/A
Current Financial Year (Year 1) N/A

Next Financial Year (Year 2) N/A

Following Financial Year (Year 3) N/A

Cross-Council Implications (how does this decision impact on other Council services, including property and priorities?)

Decisions in Guildford Borough Council regarding meeting housing needs, including unmet housing need across the HMA could lead to pressures to deliver housing elsewhere. This could affect the housing targets of other neighbouring local authorities, and potentially WBC.

SUMMARY OF CONSULTATION RESPONSES

Director of Corporate Services.

Monitoring Officer.

Leader of the Council.

Reasons for considering the report in Part 2.

n/a.

List of Background Papers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16076  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2).

GBC’s proposal for 13,860 new houses differs from all the other Borough Councils in Surrey. Too much development is planned for the north east of the borough i.e. Wisley (A35), Ripley/Send (A43) and Clandon (A25), namely 36%: this is unbalanced as presently these areas only have 11% of the existing housing within Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16088  Respondent: 15631553 / Anthony Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

1. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16112</th>
<th>Respondent: 15632289 / Claire Belton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Developers must use the many brown-field sites identified in the Borough before any other sites are even considered. Developers (and some Councillors) put profit above every else, leaving the taxpayer to pick up the ongoing bill for inappropriate development and inadequate infrastructure improvement. We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16187</th>
<th>Respondent: 15634113 / Joby Lees</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Green belt is an integral part of the community. If the planning permission is granted, the environment will be affected with local wildlife, fauna and flora possibly being destroyed for ever. If the houses are built then the population will triple. As the population has grown already the roads and transport has not increased and has not been improved; so the roads which are already poorly kept and constantly full (and don't get me started on the amount cyclists which are already hogging the roads) will get worse and will probably not be maintained or up graded. There is a lack of public transport so more people use their own cars which means generally 2 cars per house which will double quadruple road usage and more traffic jams and hold ups. Water works which are expensive and average will need up grading which will mean higher costs. More sewage works will need to be built which again means higher costs to those that are already paying. The A3 which is already used to capacity will have more traffic causing more traffic jams meaning the commute to work whether going towards London or Guildford will take much longer.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16201</th>
<th>Respondent: 15634145 / Annette Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the 2016 Draft local plan as the developments proposed are not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16202  Respondent: 15634177 / John Davies  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft local plan as the developments proposed are not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16234  Respondent: 15636289 / Chris Holmes  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GBC states the population of Guildford is estimated to reach 162,188 by 2033. If the whole region is tarmacked and high rise flats built on every scrap of land this figure could easily rise to 500,000 or more. The more houses that are built, the more the population will increase. My question is, what is the accepted end point for development, and how is this reflected in the Plan? There has to be an end point where we say - enough. With the current infrastructure (unless additional roads are proposed to be built) what is this number? My concern is that Guildford will continue to sprawl and end up becoming a Borough of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The above outline some of my key objections to the Plan - I believe there are still many questions to be answered but possibly the greatest is “What do we want our environment to look like, and how do we want to interact with it?” I have seen Guildford deteriorate over the last 30 years through continued expansion from house building. This is a great shame.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16244</th>
<th>Respondent: 15636481 / Peta Lawrence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>There is a lack of assessment of existing ‘brownfield’ sites. Better use could be made of land for housing.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16260</th>
<th>Respondent: 15637633 / Scott Kent</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16489</th>
<th>Respondent: 15639841 / May Craft</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
Lack of proportionality in development in the area and lack of sustainability

GBC’s proposals for development in East Horsley and West Horsley are disproportionate to the area. Development should be focused on Guildford Town Centre and increasing density in urban zones rather than increasing the size of sensitive villages which would:

- lead to a disproportionate impact in comparison with other parts of the borough better placed to deal with large population increases (in particular, Guildford Town Centre);
- cause irreversible harm to the Green Belt and the Surrey Hills AONB;
- place unmanageable pressure on local infrastructure (in particular, the local shops in East Horsley, Horsley Station, the Raleigh School, the Medical Centre and local roads); and
- not be sustainable.

Sustainability goes far beyond deploying low-carbon construction techniques.

Some limited development at Ockham Airfield might become appropriate if it met sustainability needs, focussed only on brownfield land and was accessible only from the A3, so as to not harm the villages. However, to deliver such a plan, it would be necessary to also address traffic congestion issues with Highways England on the A3 and the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16329  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16353  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in the coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Furthermore, I believe that there are other suitable alternative sites within the existing built up areas of the Borough that would be capable of addressing the development needs of the Borough in a more sustainable manner without irreversible degradation of the Green Belt.

Until the Council can provide a reasoned, robust and fully justified case for the removal of green field land from the Green Belt, then I strongly object to any Green Belt land release in the area of Send and Ripley, and as a result I also therefore object by default to the sites identified for development at Garlick’s Arch, Clockbarn Nurseries, Send Hill, Wisley Airfield and Gosden Hill.

In addition to the principal objection on the grounds of the impact upon the Green Belt, I also consider that there are fundamental and insurmountable issues associated with the capacity of the existing infrastructure in this part of the Borough, which wholly precludes further development of the level identified. Not only is the strategic highway network already at capacity at peak times, particularly on the A3, but the local network is also under considerable pressure, which I do not consider would be alleviated by the addition of a new A3 junction or piecemeal upgrading.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Furthermore, in my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is not justified. The disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development, despite the numerous countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

As I set out earlier on, the Guildford Borough Economic Strategy 2013 – 2031 made no such case for locating large numbers of residential units within West Horsley. I am strongly opposed to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to some aspects of Guildford Borough Council’s new Draft Local Plan, to which I have outlined below. My main objection is to the fact that 65% of the new houses planned are to be on land under current Green Belt protection which should not be lost. Additionally, I am very disappointed that the comments made in regard to the 2014 draft have not been taken into account, as evidenced by the fact that the number of planned houses has risen from 652 to 693 a year over the next 20 years.

One of the main benefits of the Green Belt is to force better land use within the urban areas surrounded by greenbelt land, as developments in the Green Belt should only be accepted in rare circumstances. However, since 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area, I am not convinced that Guildford Borough Council have demonstrated that they have maximised the potential of Guildford urban area, thus I cannot see the necessity for the irreversible loss of the greenbelt land.

While I agree that sustainable development is of fundamental importance, the Council’s proposals for sustainability through a focus on CCHP in Policy D2 are simply not enough to compensate for the consequent traffic generation and...
carbon dioxide emissions from building 650 new homes a year in the Borough, with 1,500 people who will need transport in such an environment in the Horsleys alone which encourages this increased car usage. Not only will increased traffic increase carbon dioxide emissions, increased waste generation, deforestation, energy usage within homes and new
District and Rural Centres (Proposals E8 and E9) will lead to greater greenhouse gas emissions. The Green Belt is also important environmentally for its location surrounding London, as it acts as a physical barrier resulting in improved air quality within the urban centre. With considerable note of Areas of Outstanding Natural Beauty within Guildford Borough, our local ecosystems and wildlife will suffer irreversible damage through reduction in biodiversity. Many species currently found in this area, such as the Dartford Warbler and Red Kite, are already at high risk and therefore the loss of the Green Belt land, combined with urban sprawl will lead to even further loses amongst these species. Of particular local concern is the site at Thatcher’s Hotel (Ref A36), directly adjacent to Horsley Towers conservation area. With more people near the conservation area, trampling, pollution and litter, to name a few, are serious threats to the habitats and local wildlife living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16704  Respondent: 15649825 / Chris Howes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Expansion should be constrained to protect the character of town and country in our congested County Town.

- It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16706  Respondent: 15649825 / Chris Howes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16711  Respondent: 15649825 / Chris Howes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Brownfield opportunities are being ignored. We need homes in the centre, not 40% more shops, much more accommodation on campus for students and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16725  Respondent: 15649889 / Alan Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Housing Numbers

There is no sound justification for the increased estimate of housing numbers from the last draft plan in 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16762  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

1. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “West Surrey” is much too small. Half of Guildford Borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because
developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The OAN/housing number of 13,860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15,860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London’s commuter belt. In this area the demand for housing is, in practical terms, unlimited, and predominantly dependent on what is available. The increase in the supply of housing in Guildford will simply result in a shift of population into the area, where this population would otherwise be able to find other areas in which to live. “Affordability” is not a fixed sum but is dependent on market prices. “Affordable” housing in Guildford does not come at a price that most would consider “affordable” regardless of how much of it is built. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good” but is this really the case? More consumption, more congestion, more Green Belt being taken - this is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. There will be a significant increase in traffic flows along the A247 through West Clandon, a stretch of road which is already of concern with regards to safety, funneling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge will be built on Green Belt land which was zoned to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all erosion of the Green Belt and the weak justification considering the amount of previously developed brownfield site in arguably more strategic and suitable areas to meet any "housing demand".

I object to the disproportionate amount of development in one area of the borough e.g. Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16786</th>
<th>Respondent: 15652513 / Jordan Heasman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16787</th>
<th>Respondent: 15652513 / Jordan Heasman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16788</th>
<th>Respondent: 15652513 / Jordan Heasman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY S2 PLANNING FOR THE BOROUGH

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

I am surprised that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing.

The figure of 13,860 new homes is unsubstantiated. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the NPPF and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. The NPPF also makes clear
that, once established, Green Belt boundaries should only be altered in “exceptional circumstances”, through the
preparation or review of the Local Plan. The National Planning Policy Framework (NPPF), National Planning Policy
Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional
circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical
constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and
medical requirements).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16885  **Respondent:** 15657121 / Robert Wheeler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16936  **Respondent:** 15658145 / Waverley Borough Council (Elizabeth Sims)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**PROPOSED SUBMISSION GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES**

**REGULATION 19**

Thank you for consulting Waverley Borough Council on the above document. This response has been approved by the
Council's Head of Planning Services in conjunction with the Planning Portfolio Holder.

Waverley acknowledges the valuable co-operation that has taken place between our two Boroughs over the last few years
and it is appreciated.

Our comments are as follows :-

**Policy S2 - Borough Wide Strategy**

The Council supports the housing target set out in Policy S2 of providing for 13,860 new homes (693 homes per annum
from 2011 to 2033) as this is the objectively assessed level of housing need for Guildford Borough in the West Surrey
SHMA (September 2015). The Council also supports the provision in the plan of additional Gypsy/Traveller pitches.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1817  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Woking’s unmet housing needs
The Council notes that, on the basis of the West Surrey SHMA: Guildford Addendum Report 2017, the amount of new housing that the plan provides for has reduced from 13,860 homes over the period 2013-33 (693 per annum) in the 2016 version of the plan to 12,426 new homes from 2015-34 (654 per annum) in this new version. This is a reduction of about 1,400 homes. As you will be aware, the Waverley Local Plan Part 1 (LPP1) was submitted for examination in December. This sought to provide 9,861 homes in the period 2013-32 or 519 homes per annum. Hearing sessions have just concluded and the Inspector has provisionally concluded that Waverley should increase its housing provision to 590 homes p.a., which includes a significant uplift to address affordability issues and making provision for 50% of Woking’s unmet need for the period 2013-2027 (1,575 homes, or 83 dwellings per annum over the plan period 2013 to 2032).

Whilst the Inspector made it clear that he was not examining the Guildford Local Plan, he added that Guildford would be strongly pressed at the examination into its Local Plan into why it is not intending to meet some or all of the remaining unmet needs arising from Woking.

In light of this, the Council would strongly recommend that you give further consideration as to whether Guildford BC can also make an appropriate contribution towards meeting the unmet needs of Woking. The Council understands that the revised plan includes a housing buffer of about 10%, which shows that there is already capacity to meet some of Woking’s unmet needs. in addition, it is noted that a number of sites that were included in the earlier draft Local Plan have been dropped from the latest plan for various reasons. Given the unmet need from Woking, it is anticipated that your Council may be challenged to justify why none of these sites are capable of making a contribution towards unmet needs.

During the Examination hearings, the Council identified some potential modifications to address concerns raised by the Inspector. These include a potential modification to clarify that the land between Aaron’s Hill and Halfway Lane, indicated on Plan 2 of Waverley’s submitted Local Plan, can be removed from the Green Belt in LPP1, allowing the Waverley portion of the promoted site to be allocated. The Council recommends that Guildford BC reconsiders its position on this site to allow, preferably, a joint scheme to be progressed across both authorities. The resultant development could also contribute to helping Guildford to meet the unmet needs of Woking.

Policy H1 - The proposal to require 15% of all new homes on sites of 25 homes or more to be accessible dwellings is supported, as is the requirement that 5% of homes on sites of 100 homes or more to be self build or custom build pots if there is a need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16953  Respondent: 15658465 / Michael Cuell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The disproportionate amount of development work in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16991  Respondent: 15661761 / Rob Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Wisley Airfield and Gosden Hill Farm.

For the reasons covered above, such extensive development should not be considered as they are unlikely to be needed when a realistic target housing number is established and the greenbelt status reconfirmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17083  Respondent: 15666049 / Amanda O'Brien  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In producing the new Local Plan larger sites are proposed west of Guildford to reduce the pressure on the green belt. No benefit is evident to the residents of West Horsley from this reappraisal and in fact an increased requirement for housing in their green belt is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17091  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In respect of the main body of the plan, Barratt David Wilson would like to make the following general comments below in regards to the content of the plan:

Policy S2 – Borough Wide Strategy

Whilst the provision for 13,860 new homes in the Borough across 2018-2033 is supported, Policy S2 does not indicate where housing supply will come forward between the present day and 2018. Table 1 within the supporting policy text assumes that by 2018 a supply of housing will immediately be realised from the settlements identified within the table, despite the fact that we estimate that of the 13,652 homes identified, over 60% are derived from strategic allocations where a ‘loose’ delivery period of 1-15 years is indicated. This admission alone suggests there is no clear certainty as to when these allocations may start delivering housing numbers and there needs to be a clear delivery of sites in years 1-5 of the plan.

Crucially these strategic allocations are also all heavily predicated on significant infrastructure projects coming forward to enable development, and, as such, question marks must be raised towards the numbers being realised at the rate assumed in the annual housing target. With such a heavy reliance towards strategic allocations and a well-documented historical under supply of housing across the Borough since the 2003 Local Plan, the assumption of 500 homes being delivered in 2018/19 and a further 550 homes in 2019/20, is considered to be extremely ambitious and unachievable. Indeed, it is not until year 2022/23 that the OAN figure of 693 is forecast to be met (700 homes) and this leads to a scenario whereby the OAN will not be achieved for 6 years from where we stand in the present day. Paragraph 4.1.10 acknowledges the point that the forecast housing number is ambitious stating, ‘this (housing delivery) is a higher level of development than experienced in Guildford borough during the previous Local Plan period’.

This point is reinforced by evidence within the most up to date Annual Monitoring Report -2014/15 (October 2015), Table 1 illustrates the completions of new homes in the Borough from 2006/07 through to 2014/15. The continual undersupply of housing completions is evidenced by the fact that between the years 2008/09 through to 2014/15, a total of 1420 new homes were built in the 7 year period, at a rate of 203 per annum, which is way below both the interim housing number of 322 per annum unilaterally agreed in May 2012, and is less than a third of the OAN option figure of 693 per annum supported within the Sustainability Appraisal and Housing Market Assessment carried through in to this present draft Local Plan (July 2016) Policy S2.

In light of the above paragraph, whilst the provision of 13,860 is welcomed, it does not go far enough in terms of addressing the OAN and includes no buffer provision in the event of allocated sites failing to come forward. This figure needs to be upwardly revised to capture historical evidence and the heavy reliance on strategic sites.

This historic undersupply and poor track record of delivery coupled with the heavy reliance on strategic allocations places serious concerns about the soundness of this draft plan in respect of its ability to identify a 5 year housing supply and indeed the total housing numbers identified. These numbers need to be supported by sites which can come forward early in the plan period, as endorsed within paragraph 6.3.15 in the Sustainability Appraisal which states:-

*The need to distribute growth in a sequential fashion, in-line with the established hierarchy of places, is an important consideration when examining the ‘reasonableness’ of a given distribution option. However, there are also other considerations. Notably, there is a need to support sites that:*

1. **A) are deliverable, in that homes can be delivered particularly early in the plan period;**
2. **B) bring wider benefits through the delivery of strategic infrastructure; and/or**

This paragraph makes it clear that whilst it is important to distribute growth in a sequential manner, according to hierarchy of places, there are also other considerations which should include sites which are deliverable, especially early on in the plan period. The point is essentially to consider a wider choice of the ‘type’ of site that could contribute to the housing supply, to provide a broader range of options should other sites stall, or fail to come forward for any reason.
It is also not clear within the main body of the document how the homes identified within ‘inset villages and infill development within identified Green Belt Villages’, will address the need of SANG provision if required. It is not clear whether adequate SANG provision will be available in time to serve these allocations and again, if they are reliant on larger strategic SANG coming forward, it is unlikely that they will come forward in a coordinated manner if they are in different ownership. No new housing can be occupied until the SANG is provided.

The Local Plan seeks to allocate a number of large strategic sites to deliver around two thirds of their housing requirement in the plan period. In terms of delivery period, the council suggests these sites will be delivered between years 1-15 which is wholly unlikely. As one of the largest housing developer’s in the UK, Barratt David Wilson has considerable experience in bringing large sites forward and understands the complexities and time it takes to do so. Whilst there is no objection to this overall strategy and there is some logic that larger sites are better placed to provide key infrastructure, it has to be recognised that they take much longer to deliver.

The sites at Gosden Hill Farm and Blackwell Farm require considerable elements of key infrastructure such as new junctions onto ‘A’ classified roads and new train stations requiring the co-operation of Highways England, National Rail and landowners

Whilst it is right that developments of this scale would need to mitigate their impacts such significant items of infrastructure are complex and difficult to agree and deliver. Such key elements of infrastructure would be substantial and would probably need to be delivered before new housing could be occupied which could easily take 2 years from any detailed consent. To suggest that housing from these sites could be delivered from year 1 would assume that an outline application is submitted on adoption of the plan, approved, then reserved matters applications submitted and approved, conditions discharged, work started and houses occupied – all within 12 months which is unrealistic. Given the complexity of the sites it has to be highly unlikely any housing completions would be derived from these sites within the first 5 years of the plan. The delivery period for these sites should be years 5-15.

Land at Wisley Airfield

Notwithstanding the fact that this site does not represent a logical or sensible allocation in terms of its irregular shape and relationship with existing land uses, again there are significant infrastructure issues to be resolved with Highways England on this site particularly with access improvements to the A3 and Junction 10 of the M25. The Guildford Borough Transport Strategy 2016 which forms part of the evidence base of the local plan suggests that improvement works to this junction would not be complete until 2022.

An outline planning application was refused by GBC earlier this year for a number of reasons, one of which was impact on the A3/M25. If the proposal is reliant on M25 Junction 10 improvements to be in place before occupation of units, housing could not be delivered from this site until 2022. Again the delivery period for this site should be years 5-15.

Land to the south of Normandy and north of Flexford

This would be a highly visible development in a sensitive landscape setting. There are other development options that do not have such a degree of landscape impacts. It is clearly for the council to judge whether the provision of key infrastructure such as a secondary school, outweigh the harm to the landscape. Again, should the site become allocated, given the scale and complexity of the proposals, it is unlikely that housing could be delivered in the first 5 years of the plan.

Given the comments above, we believe that consideration needs to be taken towards allocating further, smaller sites which are more likely to provide certainty of delivery in the short term in order to help address the immediate housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17095  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent: 
CONCLUSIONS

This submission is made in representation to Guildford Borough Council’s Draft Local Plan consultation (July 2016) by Barratt David Wilson Developments Southern Counties.

The proposed housing number of 13,860 for the planned period of 2018-2033 is supported as a minimum figure but requires increasing and modifying as per our comments on the section Policy S2. However, the reliance on a high percentage of strategic allocations to provide two thirds of the housing supply is objected to on the grounds that it could provide a very inflexible rate of housing supply, with little or no contribution until the back end of the plan period. The requirement for major infrastructure to support these strategic allocations coming forward does not take in to account viability, land availability and finance and is reliant on several stakeholders and landowners working in a collaborative manner.

Barratt David Wilson Homes welcome the sensible release of Green Belt sites across the Borough but believe consideration should be given to applying an appropriate buffer given the councils historic and consistent under supply. This will provide further options and choice and to provide housing in the nearer future. The housing need is now and not in years 10 to 15+.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The reduction in the housing requirement is unsound because it is not justified.

The deletion of the strategic site in Normandy/Flexford appears to have influenced the decision to reduce the overall housing target to 12,426 homes, from the 2016 draft Local Plan target of 13,860 homes. However, the justification put forward for this revised figure is considered to be weak and made despite strong evidence to the contrary which supports the previous 2016 target as a minimum figure, including:

- a chronic shortage of housing across the Borough,
- market signal across the HMA, highlighting affordability issues through lack of supply,
- evidence across the wider HMA that the identified unmet need from Woking BC has failed to be adequately addressed

The reduction of the overall housing figure is based on the whole premise of weaker economic and job growth forecasts in GBC. Crucially, it fails to consider the level of job growth elsewhere in the HMA and other neighbouring areas. The latest SHMA addendum only examines economic growth scenarios for Guildford and does not consider the implications for the rest of the HMA or, indeed, whether lower growth forecasts are applicable across the HMA. As Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across the HMA, the approach taken by Guildford is not consistent with national policy.
The Housing Trajectory table (Land Availability Assessment – June 2017) states that in years 2017/18 and 2018/19 a housing provision of 310 and 309 could potentially be yielded from approved and commenced planning permissions. Moving forward to year 2019/2020 this increases to 576 homes but each of the first 3 years of the plan are well below the ‘original’ annual target within the West Surrey SHMA (2015) of 693 – revised down to 654 in the 2017 addendum. Given the poor track record of delivery of housing in the Borough, the fact that the 654 (or 693) figure would not be exceeded until 2021 (at the earliest), does not provide confidence that the undersupply of housing will be properly addressed over the first 5 years of the plan.

Furthermore, the new paragraph 4.1.9a (page 30), states that the figures in the Annual Housing Target table sums to 12,426 homes. This statement is not true. The figures sum to 9,810. To sum to 12,426 the target of 654 dpa must be included for the first four years of the Plan period which isn’t the case. Whilst this is recognised in the 2017 Addendum to the Land Availability Assessment (LAA) the Council must be clear in the policy and supporting test to ensure that the deficit accrued during this period is properly considered.

Our concerns regarding the deliverability of the plan are exacerbated given the fact that the Council cannot show a sufficient supply of land for the first 5 years that the plan will be in operation. In the Housing Topic Paper the Council have not stated whether they propose to use the Sedgefield or Liverpool approach to assessing five year supply. It would appear that the Council will be looking to address backlog over the full plan period (The Liverpool method). This is not the approach favoured in the NPPG. In order to accord with national policy, the Sedgefield method should be used to ensure that the backlog is delivered as quickly as possible and not ‘put off’ until later in the plan. We would agree with the Council’s application of the 20% buffer to take account of the persistent under delivery of housing in the Borough.

The plan cannot be found sound if it is unable to demonstrate a 5 year housing land supply and therefore the council needs to identify housing sites that are able to come forward in the first 5 years of the plan to meet the current chronic housing shortage in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Send Parish Council also request that the Local Plan provides the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development.

Proposed Allocations for Housing Provision

Send Parish Council consider the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Whilst Send Parish support an approach to housing delivery that meets the objectively assessed need in the Borough, the allocations set out in the June 2016 Proposed Submission Local Plan represent over-development. The following section demonstrates that sufficient justification has not been provided for the levels of residential development proposed.

The West Surrey Strategic Housing Market Area is comprised of Guildford, Waverley and Woking Boroughs. The September 2015 West Surrey Strategic Housing Market Assessment (SHMA) identifies a need for 693 Dwellings Per Annum (DPA) in Guildford. Policy S2: Borough Wide Strategy, of the Proposed Submission Local Plan expects a total of 10,395 homes to be delivered between 2018 and 2033. This results in an average of 693 DPA in accordance with the SHMA.

Table 1 of Policy S2 sets out the planned delivery of housing between 2018 and 2033. Sufficient allocations are made to deliver 13,652 homes in this period; an average of 910 DPA, or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan acknowledges that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility.

The Guildford Borough Economy and Infrastructure Executive Advisory Board met on 13 April 2016 to review the draft Local Plan before it was released for consultation. Concern was raised regarding the over provision of land allocated in the Proposed Submission Local Plan when compared to the Objectively Assessed Need (OAN) figure. The Leader of the Council confirmed that this was required to ensure that the Council could meet the OAN by enabling Guildford Borough Council to have flexibility, however no justification was provided for the significant over provision.

No evidence is presented to justify allocating sites to provide 131% of the objectively assessed need. Whilst some allocated sites will inevitably not be brought forward, sites should only be allocated if they are genuinely considered to be deliverable. If the Council has evidence to suggest that approximately a quarter of the allocated sites are undeliverable then this calls for a serious re-appraisal of the proposed allocations. The Parish Council consider an approach to allocation in line with national policy to be more appropriate.

The March 2012 National Planning Policy Framework (NPPF) paragraph 47 clearly sets out the requirements for Local Planning Authorities to deliver housing through the Local Plan process. Councils should use the evidence base to ensure that the full OAN for the housing market area is met. This is recognised as 693 DPA.

NPPF Paragraph 47 requires that planning authorities demonstrate on an annual basis that there is a sufficient supply of land for five years’ worth of housing, with an additional buffer of 5%. This can be increased to a 20% buffer where there is persistent under delivery of housing. This gives a strong indication of the level of provision that the Council should be planning for and a buffer of 5% to 20% would be considered to be a far more appropriate level of flexibility. Based upon the requirement for 693 DPA, this would necessitate between 727 DPA and 832 DPA (as compared to 910 DPA provided for in the draft Local Plan), or sufficient allocations for between 10,915 and 12,474 homes. This suggests that there is currently a proposed over-allocation of between 1,178 and 2,737 homes throughout the plan period.

Send Parish are concerned that this has resulted in the allocation of sites that are not suitable for development. Sections three, four and five of this statement addresses this point further.

Distribution of Housing

Settlement Hierarchy

The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:
Send, Send Marsh and Burnt Common are considered to be large villages, although chapter 4 recognises that Send Marsh / Burnt Common are only identified as a large village due to the proximity to Send’s services. Otherwise, Send Marsh / Burnt Common would be categorised as a medium village.

Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as ‘employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing’. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.

Section 3.2 and 3.3 of the May 2014 Settlement Hierarchy Document assesses the sustainability of each of the settlements in the Borough, taking into consideration community facilities, access to public transport and employment opportunities. This document recognises that Send has a population of 2,314 and Send Marsh / Burnt Common has a population of 1,931. The report sets out functional rankings for all settlement’s in the Borough; Send, Send Marsh and Burnt Common are scored as 15/40 for the community facilities, infrastructure and transport. For comparison, Shackleford, Shalford, Albury, Wanborough, Homsbury St Mary, Jacobs Well, Gomshall, Chilworth, Effingham, West Clandon and Peaslake all have higher functional rankings, indicating that the Send area is inappropriate for any significant levels of development due to the lack of social infrastructure. Development should be focused in the most sustainable locations available.

Paragraph 10.7.1 of the June 2016 Sustainability Appraisal recognises that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery’. The May 2014 Settlement Hierarchy Report also demonstrates that Send, Send Marsh and Burnt Common have relatively poor community facility provision, especially in regards to shops and public transport.

The Send Medical Centre is not served by local busses, making it particularly difficult for those with mobility problems to attend. The parking facilities at the village shops are limited and not suitable for disabled access. Send only has hourly bus services to Guildford, with poor evening and weekend services, indicating that new homes would be very dependent on cars. In light of the recognised congestion on the A3, residential development would be far better located in areas with good access to public transport and community facilities.

The June 2016 Proposed Submission Local Plan allocates three sites in Send and Send Marsh / Burnt Common:

Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
Site A43 – Land at Garlick’s Arch – employment and 400 homes
Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches

The proposed allocation of site A43 for 400 homes would result in a population increase of 48% in Send Marsh / Burnt Common, assuming an average of 2.3 people per dwelling (this is based upon the average set out in the 2011 UK census). This represents an average population increase of 3.2% per annum across the plan period, significantly higher than ONS projections of 0.57% per annum for the UK for the same period.

For comparison, allocations A42 and A44 would result in a population increase of 8% in Send across the plan period, or 0.5% per annum. Whilst the Parish Council do not support draft allocations A42 and A44, they consider this population increase to represent a more organic rate of growth for a settlement of this size.

Send Parish object to the proposed level of residential allocations on the grounds that they do not represent sustainable development. Considering there is a demonstrable over-allocation of housing beyond what is required to meet the
Borough’s objectively assessed needs, the number of allocated homes in Send Marsh / Burnt Common should be significantly reduced.

Sections four and five of this report address the allocations that the Parish consider to be inappropriate and unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17145</th>
<th>Respondent: 15667489 / Tibbalds (Jon Herbert)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>

In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

- Remove transport infrastructure allocations SRN9 and SRN10;
- Remove allocations A43 Garlick’s Arch and A43a slip roads;
- Reinstate allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016;
- Remove allocations A42 and A44 in order to allow the Parish Council the opportunity to allocate suitable alternative sites through the Neighbourhood Plan process.
- Review the process that has been used to determine the number of traveller pitches required in light of out of date evidence base.
- Amend Policy D4 to provide scope for neighbourhood plans to identify appropriate sites and policies within the inset villages.
- Send Parish are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consolation events.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17346</th>
<th>Respondent: 15667489 / Tibbalds (Jon Herbert)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
</tbody>
</table>
Distribution of Housing

Settlement Hierarchy

The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:

1. Urban Area (Guildford)
2. Rural Service Centre x 1
3. Large Villages x 11
4. Medium Villages x 6
5. Small Villages x 6
6. Loose knit / hamlets x 13

Send, Send Marsh and Burnt Common are considered to be large villages, although chapter 4 recognises that Send Marsh / Burnt Common are only identified as a large village due to the proximity to Send’s services. Otherwise, Send Marsh / Burnt Common would be categorised as a medium village.

Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as ‘employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing’. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.

Section 3.2 and 3.3 of the May 2014 Settlement Hierarchy Document assesses the sustainability of each of the settlements in the Borough, taking into consideration community facilities, access to public transport and employment opportunities. This document recognises that Send has a population of 2,314 and Send Marsh / Burnt Common has a population of 1,931. The report sets out functional rankings for all settlement’s in the Borough; Send, Send Marsh and Burnt Common are scored as 15/40 for the community facilities, infrastructure and transport. For comparison, Shackleford, Shalford, Albury, Wombourne, Homsbury St Mary, Jacobs Well, Gomshall, Chilworth, Effingham, West Clandon and Peaslake all have higher functional rankings, indicating that the Send area is inappropriate for any significant levels of development due to the lack of social infrastructure. Development should be focused in the most sustainable locations available.

Paragraph 10.7.1 of the June 2016 Sustainability Appraisal recognises that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery’. The May 2014 Settlement Hierarchy Report also demonstrates that Send, Send Marsh and Burnt Common have relatively poor community facility provision, especially in regards to shops and public transport.

The Send Medical Centre is not served by local busses, making it particularly difficult for those with mobility problems to attend. The parking facilities at the village shops are limited and not suitable for disabled access. Send only has hourly bus services to Guildford, with poor evening and weekend services, indicating that new homes would be very dependent on cars. In light of the recognised congestion on the A3, residential development would be far better located in areas with good access to public transport and community facilities.

The June 2016 Proposed Submission Local Plan allocates three sites in Send and Send Marsh / Burnt Common:

- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
- Site A43 – Land at Garlick’s Arch – employment and 400 homes
- Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
- Site A44 – Land West of Winds Ridge â€“ 40 homes and 2 traveller pitches

The proposed allocation of site A43 for 400 homes would result in a population increase of 48% in Send Marsh / Burnt Common, assuming an average of 2.3 people per dwelling (this is based upon the average set out in the 2011 UK census).
This represents an average population increase of 3.2% per annum across the plan period, significantly higher than ONS projections of 0.57% per annum for the UK for the same period.

For comparison, allocations A42 and A44 would result in a population increase of 8% in Send across the plan period, or 0.5% per annum. Whilst the Parish Council do not support draft allocations A42 and A44, they consider this population increase to represent a more organic rate of growth for a settlement of this size.

Send Parish object to the proposed level of residential allocations on the grounds that they do not represent sustainable development. Considering there is a demonstrable over-allocation of housing beyond what is required to meet the Borough’s objectively assessed needs, the number of allocated homes in Send Marsh / Burnt Common should be significantly reduced.

Sections four and five of this report address the allocations that the Parish consider to be inappropriate and unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17147  **Respondent:** 15667937 / Vail Williams LLP (James Williams)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Policy S2 (Borough wide strategy) provides details for the overall housing numbers, and other uses, to be delivered over the plan period. Policy S2 contains the requirement for 13,860 new homes to be delivered over the plan period (2013-2033). This equates to an average of 693 per annum. It also sets the requirement for floor space in relation to B1(a) and B1(b) uses, and 4.7 – 5.3 hectares for industrial (B1c, B2 and B8), along with a target of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people between 2012 and 2017 and then an additional 30 pitches and 2 plots up to 2027. In relation to Gypsies and Travellers, Policy S2 caveats the numbers that any new target will replace these figures “as identified within an updated Traveller Accommodation Assessment.”

Unlike the proposed C3 provision for new homes, B1 uses, and sites for Gypsies and Travellers, Policy S2 does not contain a target for care home provision (C2 use). This is identified separately from the need for identified housing (C3): “In addition, the SHMA indicates a need for 1,031 bedspaces in care homes – 242 in Guildford, 396 in Waverley and 393 in Woking. This does not form part of the household population and so is separate to the need identified for housing” (Strategic Housing Market Assessment, September 2015, paragraph 10.53). This is also identified in paragraph 4.2.3 (local plan), where it notes key points from the SHMA 2015 including “there is an estimated need for 242 registered care bedspaces over the plan period”. This equals 12.1 care bed spaces per year.

Whilst associated with monitoring and Policy H1, the separation of care bedspaces continues in paragraph 4.2.7. The plan states that Use Classes C3 will contribute towards the new homes target and that “purpose-built student accommodation on campus and Use Class C2 residential institutions for older people are considered separately from general housing needs in this plan”. Indeed, the monitoring indicators on page 30 identify the targets contained within Policy S2 and will monitor the new homes completed each year, the amount of employment floor space, and the number of traveller pitches and travelling show people plots. However, there is no mention of a separate requirement or target for bedspaces / care homes within Policy S2.

With reference to the overall housing numbers identified within Policy S2, there is a requirement for 13,860 new homes. The table contained within the policy only totals 10,395, short of the requirement for 13,860. However, it is noted that
the indicative annual housing targets start in the year 2018, whereas the plan period runs from 2013 and it is assumed that this explains the difference. It is considered that, as currently presented, this is misleading and the table should cover the whole plan period, including actual completions in the years preceding adoption to demonstrate the whole housing requirement. This would provide a clearer indicative annual approach demonstrating how the Council are going to deliver the overall housing requirement for the plan period. This should also incorporate the required flexibility within the housing figures, to ensure that the overall target is met and sufficient flexibility is built into the plan, as required by the NPPF.

As already mentioned the NPPF contains a presumption in favour of sustainable development and requires flexibility, it is therefore suggested that within the first sentence of Policy S2 that the words “at least” are inserted in relation to the 13,860 new homes. The figure contained within Policy S2 should not be absolute, and any further proposals that are sustainable and in accordance with the NPPF and the development plan, should be approved without delay.

This proposed wording will also facilitate the Duty to Cooperate, allowing the flexibility to contribute to the wider unmet need within the Housing Market Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17149 | Respondent: | 15667937 / Vail Williams LLP (James Williams) | Agent: |
|-------------|---------------|-------------|---------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |

Linden Homes are the landowners of a site located within Guildford, 179 Epsom Road, which was a former care home. The site is contained within the Land Availability Assessment (LAA, May 2016) under site reference 2235. Whilst Guildford Borough Council considers that the most appropriate use of the site should be for a care home (C2) use, it should be recognised that the site has been vacant since March 2014 following a planned closure. The site was declared surplus to requirements by Surrey County Council in recognition of changing national policy to keep people in their own homes and in the community for longer. Linden Homes who acquired the site in July 2015 from Surrey County Council, are actively promoting C3 use on the site: planning application ref: 15/P/01304 for “The demolition of the existing care home building and the erection of 24 dwellings”. This application, now at appeal provides the ability to deliver 24 homes (16 private / 8 affordable), making a useful contribution towards delivery of the Borough’s objectively assessed housing needs on a brownfield site within the existing built up area. Plans indicating the site location and proposed housing offer are attached:

- 2277 – A – 1000 – A Red Line Location Plan (Omega Partnership) - 2277 – C – 1005 – N Site Layout (Omega Partnership)
- 2277 – C – 1100 – B Existing Wider Aerial Site Plan (Omega Partnership) - 2277 – C – 1101 – C Proposed Wider Aerial Site Plan (Omega Partnership) - 2277 – SK – 1010 – F Aerial Perspective (Omega Partnership)

In reference to the policies to provide a suitable mix of housing and deliver the required number of bed spaces, as set out in the SHMA (albeit not contained within Policy S2 or H1), the site should be considered against the proposed allocations policies that contain numerous reference to care homes and specialist housing. For care homes the proposed allocations include:

Policy A22 (land north of Keens Lane, Guildford), which along with 140 homes is allocated for a care home for “approximately 60 beds”.

Policy A46 (land to the south of Normandy and north of Flexford) is allocated for approximately 1,100 homes and specialist housing, and in addition it also includes “approximately 60 beds” for a residential care home.
Furthermore, there are a number of other relevant allocations, including:

Policy A25 (Godstone Hill Farm, Mallow Lane) – Residential lead mixed use development, allocated for: “Approximately 2000 homes (C3), including some specialist housing and self-build plots…”

Policy A26 (Blackwell Farm, Hogs Back) - Residential lead mixed use development, allocated for: “Approximately 1800 homes (C3), including some specialist housing and self-build plots…”

Policy A35 (Land at former Wisley Airfield, Ockham) – Residential lead mixed use development, allocated for: “Approximately 2000 homes (C3), including some specialist housing and self-build plots…”

Each of these Policies proposes circa. 2,000 homes and are stated to provide “some specialist housing”.

Whilst the numbers for specialist housing are not set within the policies, the sites identified above would be capable of providing significant C2 care home bed spaces. Given the size of these proposed allocations, they would easily be able to meet the required need for care homes, as set out in the SHMA (242 care bed spaces over the whole Plan period, equating to an average of 12.1 per annum). Furthermore, other allocated sites and other sites within the developed areas could also be owned, or purchased by, a care home provider thereby providing an additional source for meeting the C2 need of the Borough.

Therefore, it is easily possible to deliver the required number of care homes (identified in the SHMA: 242 care bed spaces over the plan period / 12.1 per year) through the proposed allocated sites contained within the proposed submission Local Plan.

179 Epsom Road, Guildford, is clearly available now and the site is suitable for residential development, as it is sustainable, being within the main built up area boundary of Guildford, and within a predominantly residential area. We would urge Guildford Borough Council to consider this site as an allocated site for C3 housing.

The delivery of housing, to meet all needs within the Borough and the wider Housing Market Area, is a fundamental part of the plan as detailed in the Strategic Policy S2 (13,860 new homes over the Plan period / 693 dwellings per year). The site is available immediately for the delivery of much needed market and affordable housing within Guildford Borough.

This will assist with the quick delivery of housing, in accordance with the NPPF, and to help ensure a regular supply of housing within the early part of the plan period. This is especially important as the proposed indicative annual requirement is weighted towards the later part of the plan period, rather than focusing on the immediate delivery of housing.

Examination

Given the high importance placed on housing delivery by National Policy, local authorities should “boost significantly the supply of housing” (NPPF paragraph 47), and the representations above, we wish to express an interest in participating at the examination and attend any pre-examination meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

2277-C-1005-N Coloured Site Layout.pdf (880 KB)
15_P_01304-LOCATION_PLAN-821415.pdf (122 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the 2016 Draft Local Plan for a number of reasons: -

The amount of housing being proposed in one area of the borough, which is disproportionate to the entire borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3269</th>
<th>Respondent:</th>
<th>15672545 / Future Planning &amp; Development (Garry Hutchinson)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

3 Grounds for Allocation of the site for Housing

3.1 Our initial representations from July 2016 made clear that the Local Plan had failed to suitably plan to meet the borough’s identified housing need over the plan period. A number of shortcomings were identified. The principle issue was the persistent under delivery of housing which has resulted in a significant short-fall and the fact that a 20% buffer was not applied in accordance with the NPPF. Additionally, the Local Plan failed to identify when strategic sites will be delivered and it also made modifications to the housing supply trajectory which sought to mask the acute housing land supply issues which were not addressed by allocating enough sites for housing.

3.2 It is not unreasonable to assume that the housing supply situation in the borough has worsened since the end of the previous consultation in July 2016. However, rather than reassess this situation, this statement seeks to provide evidence to demonstrate that the site can deliver much needed housing for the borough in the short-term (0-5 years).

3.3 In parallel with the promotion of the site through the Local Plan preparation, Send Surrey Limited have also obtained pre-application advice from the Council pursuant to obtaining outline planning permission for a development of 53 residential unit development on site.

3.4 A pre-application meeting was held in April 2017 at the Council’s offices and the follow-up advice was received in July 2017. The pre-application advice confirmed that the principle of residential development on the site was acceptable. The pre-application noted that the number of units would need to be significantly reduced from 53 to ensure that the site retains its amenity value.

3.5 The pre-application scheme was informed by a number of supporting documents. This evidence, and other information pertinent to the deliverability of the site, is described under the respective headings.

   a) Trees

3.6 A principle area for assessment was trees. A Tree Survey was undertaken in December 2016, this is provided in Appendix 6.

3.7 The Tree Survey focused on the developable area within the centre of the site, with a tree buffer retained along the northern and western boundary of the site to maintain amenity value. The survey found that the majority of the trees were Category C (trees of low quality).
3.8 A Tree Constraints Plan was prepared to establish the developable area of the site; this is given in Appendix 7. The plan identified a developable area of 1.54ha in the central part of the site. The Tree Constraints Plan was then used to inform a revised Site Layout, this is provided in Appendix 8.

b) Access

3.9 Following the preparation of the revised Site Layout, a Tree Impact Plan was prepared, this is given in Appendix 9. This identified that only one potential issue (as highlighted on the Tree Impact Plan) with the proposed access road and associated footway positioned within the RPAs of trees 74 & 75. Although the proposed access road would be within the RPA of these trees a solution is noted and could be designed out at the detailed design stage, subject to Highways approval.

c) Ecology

3.10 A Preliminary Ecological Appraisal was undertaken by Urban Edge Environmental in January 2016, this was updated in July 2017 following further surveys see Appendix 10. A Reptile Survey was completed in July 2017, this is provided in Appendix 11. A Invertebrate Survey was also completed in July 2017, this is given in Appendix 12.

3.11 There are no over-riding ecological constraints on the proposed development as detailed in the initial findings of the surveys. Further surveys will be undertaken during the appropriate seasons and recommended mitigation measures will be implemented at the appropriate stage of any development.

3.12 Subject to the final survey results, the development proposals will be updated to take advantage of any opportunities for ecological enhancement. For example, there might be an opportunity to provide an ecological benefit for otters and voles through re-profiling of the river banks or scrub clearance, both of which will improve their habitat.

d) Site Ownership

3.13 The site is being promoted by a single company called Send Surrey Ltd (registered number 10173245). The company intends to develop the site for housing. The site is available, viable and deliverable for housing in the short-term (0 – 5 years).

3.14 A single title (for Send Surrey Limited) is currently being formalised. This will be supplemented by an agreement signed by all landowners.

e) Meeting Identified Housing and Affordable Housing Need

3.15 The Indicative Layout submitted with the representations in July 2016 proposed a layout for 40 units; this comprised a mixture of detached and semi-detached housing.

3.16 Following the Tree Survey and Tree Constraints plan, a revised layout for 53 units was prepared within the 1.54ha developable area (see Appendix 8).

3.17 The Local Plan Proposed Submission Policy H2 provides guidance on affordable housing. It requires affordable housing of 40% on all sites over 0.17ha. The tenure and size of affordable homes must contribute towards meeting the mix of affordable housing needs identified in the joint West Surrey Strategic Housing Market Assessment 2015 (SHMA) or subsequent affordable housing needs evidence. This currently includes a tenure split of at least 70% rented, with the remainder being other forms of affordable housing.

3.18 In accordance with the draft policy, any residential development will provide 40% affordable housing. The housing mix will respond to needs identified through the SHMA in the context of the physical constraints of the site. The Revised Site Layout was prepared in accordance with the recommendations of the SHMA.

3.19 The key findings of the SHMA relevant to the site are summarised as follows:
- For affordable housing the focus should be on smaller properties, whilst recognising that one-bed properties have limited flexibility to changing household circumstances and therefore a higher turnover of occupants. For affordable
houses there is a need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes (page 131).

- There is a need for 455 affordable homes in Guildford per year (page 102), to meet the existing backlog and arising need (at a 30% income threshold).

- For market accommodation the focus of provision should be on smaller family housing. The recommended mix is for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes (page 132).

3.20 In accordance with the findings of the SHMA, an indicative housing mix is proposed in accordance with the identified need.

3.21 An affordable housing policy and SHMA compliant mix is given as follows:

[see table in attachment]

3.22 The proposed indicative housing mix is given as follows:

[see table in attachment]

3.23 As can be seen from the table above, the proposed indicative housing mix is fully compliant with the affordable housing requirement of 40% and also the identified housing need from the SHMA. This is a significant benefit of the scheme.

   f) Meeting Identified Local Affordable Housing Need

3.24 Given the wide ranging nature and strategic recommendations from the SHMA, further research was undertaken to find out the affordable housing need at ward level, i.e. Send ward.

3.25 There are 22 people on the Housing Register in the ward of Send. The housing needs are as follows: 1 bedroom need = 13; 2 bedroom need = 7 and 3 bedroom need = 2.

[see table in attachment]

3.26 Although the Housing Register is subject to change and the information provided only provides a snapshot of a certain point in time, i.e. January 2017, it is particularly relevant to show that the proposal would almost fully meet the current identified local affordable housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Local Plan Representation - Send Surrey Limited - Part 2 of 2.pdf (9.8 MB)  Local Plan Representation - Send Surrey Limited - Part 1 of 2.pdf (4.8 MB)
I object to the disproportionate size of sites relative to the historic rural villages they will ruin.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17243  **Respondent:** 15673185 / Simon Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the impact of excessive development on the already congested Strategic Road Network particularly on the A3 and M25

I object to the fact that there is no tolerance planned at all for accidents, roadworks etc on the SRN which already impact local roads often resulting in gridlock.

I object to the fact that this proposed plan does not meet the needs of local communities.

I object to the fact that insufficient truly affordable housing is being proposed. There is no evidence that any calculations at all have been done; no sensitivity analysis on interest rates; costs of running cars etc.

I object to the impact of further congestion on local village roads and lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17249  **Respondent:** 15673185 / Simon Jefferies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the draft plan which proposes over 70% of new housing on the greenbelt. This will ruin the countryside for ever impacting both current and future residents.

I object to the allocation Three Farms Meadows – allocation A35. I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances exist. GBC Planning Committee’s unanimous rejection of an almost identical proposal less than six months ago, despite being couched in terminology which was aimed at removing many of their objections if the site were to be removed from the greenbelt must be considered particularly as any removal from the greenbelt must demonstrate very special circumstances and this plan does not. I therefore strongly object due to:

1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
3. Unsustainable due to poor air quality impact on both housing and the SPA
4. Impact on views to and from the Surrey Hills AONB
5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
6. Road, sewerage, fresh water, gas and electric capacity does not exist.
7. Funding for infrastructure from Central government does not exist;
8. There is already a huge infrastructure deficit in terms of roads. This is not properly taken into account.
9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge.
10. No consideration has been taken of the current and future plans of the RHS Wisley. These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local Authorities.
12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

I object to the allocation at Garlick’s Arch – allocation A43 due to the loss of ancient woodland; the impact on all local infrastructure of another 400 houses; the site is too close to the A3 and will have poor air quality. The SRN is meant to be for THROUGH TRAFFIC not local traffic. Numerous junctions will slow progress for all users and increase accidents due to more lane changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly, the Burnt Common Nurseries site (BCN) can satisfactorily accommodate the previously agreed quantum of development – 7,000 square metres of employment floorspace and up to 100 homes on the site, without incursion onto or requiring any part of the Ewbanks auctioneers site.

Secondly, removing at least part, if not all, of the Ewbanks element from the previous allocation would increase the separation gap in Green Belt terms from the proposed Gosden Hill allocation; addressing the second bullet point referred to on the late correction update sheet to the 11th May Executive Committee justifying the allocation of Garlick’s Arch (GA) in place of the BCN site.

Thirdly, the Ewbanks area of the site is more constrained for development due to its more open and narrowing nature towards the junction of the A3 and the slip road off the A3.

This representation sets out why the BCN site should be re-allocated, including in part due to its benefits as compared to the GA site (see evidence later in this representation). Clearly, the Council needs to allocate sufficient land to meet its up-to-date objectively assessed need for housing and employment requirement. There are very strong reasons for the BCN site to be re-allocated, which are discussed below.

The Newship Group has built, let and managed a number of industrial estates over the last 38 years. This site has been owned by the Newship Group since the 1980’s, originally when it was run as commercial nursery, with vast commercial greenhouse buildings spread across the site, together with the warehouse buildings. The commercial nursery use failed due to foreign competition and losing its main customer. The site has not, therefore, been held speculatively and not been sold on to a developer, which could well have happened if it were not for the responsible ownership of the Newship Group. The intention is to progressively develop the site for much need local employment premises, for which there have been a number of expressions of interest from companies unable to identify suitable commercial space, together with much needed housing as a sustainable mixed use development.

Over the last three years, the Newship Group has worked closely and positively with the Council to bring forward the undeveloped part of the site for business use and potentially 100 homes.

It was therefore a surprise and disappointment when, due to the quick change of direction part way through the Committee process, the allocation of the site was removed from the emerging Plan. The Group remains keen to work closely with the Council on delivering this site, which is acknowledged to be appropriate for development, particularly for employment use, but also for a proportionate amount of housing.

It is important to note, when assessing the relative merits of sites, that there were relatively few objections to the previous allocation of the site in the 2014 Plan. This position has been supported in our recent discussions with both Send Parish Council and those residents involved in Save Ripley, both of whom, as we understand it, support our site as opposed to the Garlicks Arch site. The relative weight of public opinion should be strongly taken into account when concluding on the best site in this area.

The Newship Group is primarily interested in delivering employment and has been working towards achieving this objective in collaboration with the Council for a number of years. There are four main reasons why the Burnt Common Nurseries site is considered a much more certain and credible location to deliver the employment space needed.

Firstly, it is an existing employment site. It makes much more sense to consolidate employment at Burnt Common in one location, rather than spread it over two. It is also a more efficient of use land and would result in an external economy of scale, due to its location adjacent to similar enterprises. This would not be the case at Garlick’s Arch, where there is a car repair/ garage only (planning permission for residential applied for).

Secondly, it offers the opportunity to deliver early expansion. Unlike Garlick’s Arch, the site is not dependent on new access roads, nor do electricity pylons run across the site. It is not in a restrictive flood zone. There are also extensive areas of ancient woodland that require careful consideration as part of any scheme on the Garlick’s Arch site. Given the lack of such constraints Burnt Common Nurseries Ltd are in a position to submit planning applications and begin on-site straight away. That is important, because deliverability will be a key issue when assessing the soundness of the emerging Plan at the Local Plan examination.
Thirdly, the Burnt Common Nurseries site is an acceptable site that does not compromise the purposes of the Green Belt. Although both sites are in the Green Belt, only the BCN site has a significant proportion of previously-developed land. There are also 24,000 square metres of land surrounding the existing warehouses so 7,000 square metres of employment space could easily be absorbed without having an adverse impact on openness or the five purposes of the Green Belt. This is why the Council previously proposed to allocate it.

Fourthly, the site is sustainable, with good vehicular access that minimises the impact on the local highway network and local residents. The site is close enough to Send Marsh to provide shorter and more convenient journeys to work and promote rural sustainability, but is also sufficiently removed from the main residential areas and sufficiently screened by mature trees to minimise impact on residential amenity. The existing highway network facilitates convenient access to and from the A3 without needing to travel through the existing village.

In summary, the most logical, reliable and credible allocation for employment space, with the least constraints, is the Land around the existing Burnt Common Warehouse. The Newship Group is committed to providing this, and its track-record offers peace of mind that it would be delivered early and to a high standard. To demonstrate this, a proposed site plan dated September 2014 (prepared by Edgington Spink Hyne Architects) is enclosed with this representation. This shows the first phase of commercial development on the site, which would be replicated (handed) immediately to the west to provide the total commercial floorspace envisaged, in an attractive and well landscaped setting.

In overall terms the proposal to locate further employment space alongside an existing commercial employment estate (and a former commercial nursery) is the most logical and appropriate solution for the Burntcommon and Sendmarsh area. The Newship Group, operators of BCN Ltd, have significant experience of developing such employment sites. The housing is not Newship’s prime area of concern, but an allocation for approximately 100 homes in this location, between existing commercial buildings and housing along the A247, is the most commensurate, proportionate and logical place to accommodate such a development in Burntcommon and Sendmarsh. The lack of constraints and single ownership ensure that early delivery could take place.

Relevant background, history and assessment

The Draft Local Plan explains that Send is one of only two villages in the Borough where affordable housing in perpetuity as a rural exception cannot be provided. Thus, a previously developed site that provides affordable housing in Send would contribute significantly to local need in a manner compliant with national and local planning policy. This is clearly a very significant material consideration when determining potential sites to allocate for future development.

Policy 9 of the Draft Local Plan (2014) explains that development should help support the present and future economic, environmental and social sustainability of the rural settlements, commensurate to their size, character and function. The Policy continues, explaining that ‘… all development should be appropriate in scale and design, having regard to each settlement’s identity, countryside setting and local character and distinctiveness.’ This is particularly relevant for the Council to take into account when considering the scale of allocation appropriate for Burntcommon and Sendmarsh. The proposed allocation at BCN is commensurate to the size, character and function of Burntcommon and Sendmarsh.

In relation to the Green Belt, Draft Local Plan Policy 10 is clearly relevant. This Policy explains that the Green Belt will be protected against inappropriate development in accordance with national planning policy to maintain its openness and open character.

The site is currently located within the Green Belt. The Green Belt and Countryside Study (GBCS), which forms part of the evidence base to the emerging Local Plan included the site as B13-D (critically with additional wider areas of land steering the assessment to be scored two against green belt purposes when in fact the BCN land itself would result in a preferential score). Following review of the GBCS, it was identified as a Potential Development Area (PDA) due to its sustainability credentials, accessibility and defensible boundaries.

The site was also identified in the Strategy and Sites Issues and Options Paper as having good potential for industrial (Use Class B2) and/or warehouse (Use Class B8) uses (see Information Sheet 59 in Appendix D of the Issues and Options Paper 2013).

The site was subsequently positively allocated in the Draft Local Plan (2014), for up to 7000 square metres of light industrial (B1c), general industrial (B2) and/or storage and distribution (B8) employment buildings and approximately

---

Page 1578 of 1722

Document page number 2279
100 homes (C3). Land to the east of the existing warehouses was considered appropriate for new homes, at least 40% of which would be affordable. Land to the rear and the west of the existing employment buildings would be appropriate for employment expansion.

The site was included in the Land Availability Assessment (LAA) dated February 2016 as Site Reference 152 and the conclusions of this document are pertinent and relevant to constraint and delivery considerations. It is accepted that the site is in Flood Zone 1, at low risk of flooding, and that residential and commercial development would not adversely affect flood risk elsewhere. Drainage infrastructure would be required. It is accepted that development here would be acceptable on the local highway network.

The report concludes that ‘Provision of new homes and commercial development here would help towards meeting the housing and employment need in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities.’ It is accepted that ‘There is a realistic prospect that development will be delivered within the first five years of the Local Plan…..The site is most suited for mixed residential and commercial development, to provide new homes and jobs to help meet the identified need.’

Approximately 20,000 representations were made to GBC on the 2014 Draft Local Plan. Limited adverse comments were received to the BCN site. Having considered those comments, GBC again proposed the allocation for BCN in the 2016 Proposed Submission Local Plan as Policy A43. This was considered at the Borough, Economy and Infrastructure Executive Advisory Board Committee on 13 April. The site at BCN was agreed by this Committee without comment.

The site was again included in the proposed Submission Plan to the Executive Committee by Officers, but in a late update sheet, officers recommended that the BCN site be replaced by the GA site. The Executive Committee agreed this change with very little supporting argument or information; the late update sheet comprising a single side of A4 text, putting forward 4 reasons for the change.

Our assessment of reasons put forward to the Executive Committee recommending the change from BCN to GA:

**Provision of land for slip-roads**
The slip-roads are identified as a long term aspiration; they have not been fully assessed or even their need agreed by Highways England. We understand that the land ownership required to provide them is not all in the control of the GA owners. The funding has not been specifically quantified or agreed. Slip-roads will result in significantly more traffic on local roads in the Burntcommon and Sendmarsh area (Guildford will be aware of Woking’s proposals for a significant allocation of land at Mayford for approx. 600 homes in their emerging Plan. The traffic from that development and south Woking would be encouraged to utilise the A247 through Sendmarsh to access the A3, particularly if the junction was upgraded to provide a northbound access onto the A3). If slip-roads are pursued, they could be secured via other means i.e. being reserved pending Highways England conclusions or via CPO. Therefore, the provision of land to potentially provide slip-roads should not obscure and/ or outweigh serious questions over the appropriateness of the GA allocation in terms of Green Belt constraints and in terms of delivery and early delivery in particular. The GA site must still be considered on its own merits as to whether it complies with planning policies in the round, in comparison to other local sites and is a commensurate, proportionate and appropriate allocation in relation to Burntcommon and Sendmarsh.

**Greater separation from Gosden Hill Farm proposed allocation**
If the proposed allocation for BCN is reduced in size to remove either the whole or significant part of Ewbank auctions site, as suggested earlier in this representation, the distance from the newly expanded Gosden Hill Farm site to the newly proposed BCN site will be increased. In any case, the existence of a) the A3, b) significant mature woodland screening and c) a significant change in levels, between the two sites is a significant and sufficient defensible barrier both in functional green belt gap and visual amenity terms between the two sites to enable both the Gosden Hill Farm and the BCN site to be allocated.

**Provision of employment floorspace**
The proposed employment allocation in the 2014 Local Plan and original 2016 versions both had a commercial development allocation of up to 7,000 square metres on the BCN site. This figure was then transferred directly to the GA site. This does not strike us as being a reason to support the GA site. The employment allocation is clearly far more appropriate adjacent to an existing employment area in Burntcommon and Sendmarsh that is more appropriately located in relation to the main part of Burntcommon and Sendmarsh, comprising a more enclosed and contained site that is less
harmful to the character of the landscape and visual amenity) for such a use (please see the enclosed Landscape and
Visual Appraisal (LVA) for reference). There is also the clear option, if the GA site is to be kept in the Plan,
notwithstanding early delivery and constraint concerns, to potentially split the allocation between solely residential on the
GA site, of whatever scale, and employment, with or without residential, also on the BCN site. Clearly our strong view is
that both employment and residential can satisfactorily be accommodated at BCN early in the plan period due to the lack
of constraints and single ownership.

Additional capacity for early delivery of more residential development

WYG take the view that this also is an erroneous reason. For the above reasons, early delivery at GA is unlikely to be
possible due to the number of constraints applying to that site and the lack of single ownership, as we understand the
position. Although the site could accommodate more development than BCN, whether it can be realistically delivered at
an early stage in the Plan period is in doubt until and if proved otherwise. Early delivery at BCN is in our view far more
likely to materialise due to the lack of constraints on the site and the single ownership of BCN.

Whilst Full Council agreed the Draft Plan for consultation, including GA, not BCN, there was considerable support from
the public at the meeting for the BCN site following public speaking.

The current consultation should enable the Council’s Officers and Councillors to take stock of the situation. The Council
is urged to allocate the BCN site as the most commensurate, logical and appropriate place to accommodate, in particular,

further employment development but also a commensurate amount of additional much-needed housing, including a
significant proportion of affordable housing.

Site Location and Description

The site lies between Guildford to the south-west and Woking to the north. The site has good access to the highway
network with the B2215 leading directly onto the A3 at Ripley and just one junction up the A3 is junction 10 of the M25.

The site is currently a partly previously developed commercial employment site with surrounding greenfield land
comprising approximately 10.6 hectares in size. It lies within the Green Belt, but adjacent to the existing settlement of
Burnt Common and Send Marsh.

It is overgrown unused land surrounding the relatively large scale commercial warehouses at present. It is enclosed by
tree belts and the old A3 London Road to the north and east, tree cover and the A3 to the south with hedgerows and
housing lining the Clandon Road (A247) to the east. Urban influences are provided by the residential properties to the
east on the Clandon Road, and the existing central commercial uses to the centre and the west (a 5000 square metre
warehouse/ industrial estate and an auction centre respectively), as well as the new and old A3.

The overall land holding is not subject to any statutory or non-statutory landscape designations, or cultural or heritage
designations. A disused public footpath lies to the east, this previously extended southwards, however the construction of
the A3 severed this route and it has been formally extinguished.

The subject site is situated to the south of London Road (B2215), which was formally part of the A3. It is bordered to the
south by the current A3, with a small area of ancient woodland adjacent and separating the site from the A3.

The site is located directly off the little used but very safe southwest bound carriage of the B2215. A safe highway access
from the site onto this road already exists.

The character of the area surrounding the site is a mix of residential and commercial. Central to the site is an existing
depot, which provides 5,110sqm of commercial space that is currently utilised by three businesses operating under Use
Class B1/ B2/ B8. Further to the west is an auctioneers. Therefore, to the centre of the site, and further to the west, the
nature of activity is commercial. However directly adjoining the site to the east are residential dwellings which form part
of Burnt Common/Send Marsh and this character extends north and eastwards. Therefore, the character of the area
directly adjoining the site (already identified as being suitable for residential development) is strongly influenced by the
residential dwellings of Burnt Common, in particular those of Clandon Road, which lie directly to the north and east of
the site.
Site ownership
The BCN site is in one ownership - Burnt Common Nurseries Ltd., operated by the Newship Group. The wider allocation including the Ewbank auctioneers is clearly in separate ownership. As previously explained, the 7000 square metres of commercial floorspace and approximately 100 homes can satisfactorily be accommodated without that land, effectively being accommodated around the existing 5,110 square metres of existing employment warehouse and industrial development.

Site sustainability
A key consideration in assessing whether a site is suitable for residential use is the need to ensure that the site is located in a location that is sufficiently sustainable for the level of development envisaged.

The NPPF places a presumption in favour of sustainable development, and on the basis of the Council’s own conclusions in the GBCS the application site is not an unsustainable one. This Study gives the site a sustainability score of 5.25 and a sustainability ranking of 26 and as such the site is considered to be moderately sustainable, falling approximately in the middle of the ranking system devised in the GBCS.

Burnt Common/ Send Marsh has been classified as a village in the settlement hierarchy stated in the Draft Borough Local Plan: Strategy and Sites (2014). Policy 9 of the Draft Local Plan explains that 'Development should help support the present and future economic, environmental and social sustainability of the rural settlements, commensurate to their size, character and function.'

Thus, the Council considers the village can accommodate future development, commensurate to its size, character and function.

Turning to the site specific characteristics of the application site, it is in a sustainable location given its size, character and function. As explained in more detail later in this representation, the size of the site is appropriate to the existing scale of the village and its character. A significant part of the site is also already in use for employment purposes and the proposed allocation is for additional small and medium-sized commercial units to the south-west of the existing industrial unit and up to 100 dwellings on land adjacent to the existing village.

Given the need for new housing sites in the Borough (see later section) the assessment that is given in the Council’s GBCS and the attached landscape and visual appraisal, it is considered to be suitable for the proposed development. The site is accessible by public transport, walking and cycling and benefits from pedestrian and cycle access to a range of local services and facilities. The centre of Send Village, which has numerous shops and local facilities/ amenities, is within 2km from the site, with Send/ Ripley health centre and pharmacy only 500m from the site, and this is acknowledged by national policy as being an acceptable walking distance.

There are a number of bus stops within 400-500m of the site. Bus services 462 and 463 together provide an hourly service Monday to Friday between Woking and Guildford and also serve the residential areas of West Clandon, Send Marsh and Old Woking. Bus service 515/ 515A also provides an hourly service between Guildford and Kingston-upon-Thames Monday to Sunday.

In terms of a railway station, the main line station at West Clandon is approximately 2.5km to the south of the site and linked with the site by bus service 463. This station benefits from regular services between Guildford and London Waterloo. Guildford and Woking railway stations, which are accessible by bus services 462 and 463 are on the fast line to London Waterloo, Basingstoke, Portsmouth and Alton. Existing rail facilities provide the opportunity to travel to the site by train as part of a linked bus or cycle journey.

There is an existing footpath on the northern side of the B2215, which provides connections to nearby bus stops and continues to other local facilities available in the vicinity of the site. There is also an existing on-road cycleway on both sides of London Road, which continues along the B2215 Portsmouth Road and provides a local connection to the centre of Ripley. A dedicated cycle route also runs alongside the A3 leading south-west towards Burpham (approximately 3.5km away), where it links to the wider cycle network around Guildford. There is a further shared pedestrian/ cycle link along the A247 between Burnt Common roundabout and local amenities in Send. To the south-east a further cycle link runs east along Tithebarns Lane connecting to a wider cycle network towards West Horsley. The site therefore benefits from good pedestrian and cycle connections.
The following local amenities are located in close proximity to the site – a petrol station with a Little Waitrose convenience store approximately 100m from the site, a doctor’s surgery and pharmacy 500m away. Further convenience stores, newsagents, takeaway restaurants, a café and a post office are located in Send village (via Send Barns Lane), approximately 2km away. Further amenities are available at Ripley High Street which is 3km away.

In addition to this the site is within easy access of both the A3 and M25, with the B2215 providing direct access to both.

The sustainability credentials of the site and its proximity to the facilities of Send have undoubtedly contributed to Burnt Common/Send Marsh being classified as a village. With all of this in mind it is considered that the site is sustainably located and therefore accords with the principle of sustainable development in this regard.

Indeed, the ‘Send Marsh and Burntcommon – Major Village Expansion’ review carried out as part of the Green Belt and Countryside Study (2014), considered the sustainability credentials of both sites as existing (as well as two other local sites). Significantly, it ranked the Burnt Common Nurseries site in first place whilst the Garlick’s Arch site was ranked in last place.

As such, it is apparent that the Burnt Common Nurseries site is preferable in terms of its sustainability credentials.

The provision of two new slip roads at the A3 as part of the Garlick’s Arch scheme could also be considered as being contrary to the principles of encouraging travel by non-car modes, as advocated in the NPPF.

Need for commercial development
In August 2014 Lambert Smith Hampton (LSH) prepared a statement on the need for small industrial and commercial units within the Borough. This statement is attached to this representation for information. The statement found that the existing stock of buildings is very low and insufficient to meet future needs. In addition to this, a large area of land at Slyfield (known as the Slyfield Area Regeneration Project) has yet to materialise. Thus, LSH concluded that there was insufficient employment land supply to meet future growth needs and so new employment sites must be found in the Borough. Finally, the statement indicated that the Burnt Common Nurseries site would be a suitable location for small/medium sized units due to its proximity and accessibility to the principal road network.

The site was allocated in the Draft Local Plan (2014), which makes provision for at least 21ha of employment land to help support the economy. Up to 55,000sqm of employment floorspace is identified as required around villages (see Table 1 of the Draft Local Plan: Strategy and Sites, 2014). The Plan explains that this is a higher level of development than experienced in Guildford during the previous Plan period and represents an increase in employment floorspace.

In allocating the site, the Council found that:

Land to the west of the existing warehouses is suitable for new employment uses (Use Classes B1c, B2 and B8); and

That if new homes are not provided, the whole of the site is suitable for new employment uses.

Thus, the land was assessed and considered suitable for employment development.

Since the statement by Lambert Smith Hampton the Council has resolved to plan for a higher amount of employment land than noted in the Lambert Smith Hampton statement. The majority of the proposed new employment floorspace is now allocated in urban extensions to Guildford and at the former Wisley airfield. These are strategic locations that will take many years to come forward. Thus, the supply of suitable, modern employment floorspace would continue to be constrained, affecting supply. This has a knock-on effect on the creation of jobs, which impacts upon the local economy. At a time when there is a significant increase in the quantum of residential development, pursuing such a policy is at risk of being in conflict with the objectives of sustainable development.

Lambert Smith Hampton is in the process of further updating their report but in the meantime they have provided the attached letter which concludes that supply has diminished further since 2014 and demand is still solid so the need is even greater at the present day.

Re-allocating the land at Burnt Common Nurseries facilitates the early delivery of employment floorspace that has been demonstrated to be urgently needed. Provision of the units would contribute to the objectives of sustainable development
by helping to meet the existing need for industrial and warehouse floorspace and facilitate job creation opportunities at an early stage in the Plan period.

Need for deliverable housing sites in Guildford
Of considerable importance when considering the principle of residential development at the site is the need to deliver housing (particularly affordable housing), to meet local needs. This is a top priority for both national Government and Guildford Borough Council.

Paragraph 47 of the NPPF requires LPA’s to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years’ worth of housing against their requirements. At the present time the Council does not have a 5-year supply of housing and is unlikely to be able to meet this target for some years. As a result, a site that can quickly deliver new dwellings in a manner that is compliant with or exceeds policy requirements in all other respects should be a very strong candidate for allocating in the emerging Local Plan.

The NPPF makes it clear that local authorities should provide an additional buffer of 5% on their 5-year housing supply requirements, which should increase to 20% for Boroughs which have a persistent under delivery of housing. Therefore, the NPPF places a more onerous requirement on local authorities to provide for an adequate supply of housing. The Council have acknowledged this, and have also accepted that it cannot meet all of its housing need from within the Borough’s urban and settlement areas. As such it has allocated sites from within the Green Belt and countryside beyond the Green Belt that could help to meet the deficit between need/demand and supply. A significant number are large sites, which will take years to deliver new housing in sufficient numbers to address the current shortfall.

An example of this is the new settlement at Wisley (on the former airfield), which is allocated for over 2,000 homes. A planning application was recently refused for mixed use development on this site. One of the (many) reasons for refusal was that: 

‘It has not been demonstrated that the development proposed would not give rise to a severe adverse impact on the safe and efficient operation of the strategic road network (A3/ M25), nor that it would not give rise to a severe impact to the efficient operation of the local road network.’

It is not and will not be possible to demonstrate the proposed development at Wisley would not give rise to a severe adverse impact on the safe and efficient operation of the strategic road network (A3/ M25) until such time as Highways England implement plans to improve junction 10 of the M25.

A scheme to improve the M25 Junction 10/ A3 Wisley interchange is identified in the Department for Transport’s Road Investment Strategy for the period 2015-2020. Highways England confirm that there is currently no project team and that the improvements are not due to begin until after 2020.

Thus, it is not possible to bring forward strategic development at Wisley prior to 2020.

As a result, should other strategic sites in the Green Belt (such as Wisley) not be allocated for development, the Burnt Common Nurseries site becomes all the more relevant and necessary to enable the Council to achieve its objectives.

The NPPF seeks to boost significantly the supply of housing (paragraph 47), with paragraph 49 stating that ‘Housing applications should be considered in the context of the presumption in favour of sustainable development.’ To achieve this, the NPPF states that ‘local authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible’ (paragraph 187). When assessing and determining development proposals the NPPF makes it very clear that local authorities should apply the presumption in favour of sustainable development (paragraph 197) and that where the development plan is absent, silent or relevant policies out-of-date planning permission should be granted (paragraph 14).

For the reasons identified in the preceding section of this report the site is considered to meet sustainability objectives and therefore residential development of the identified land would compromise sustainable development.

It is clear that Guildford Borough is facing a significant long term under-supply of new housing to meet its objectively assessed needs.
Given the Council will not have a 5-year supply of housing for some years is a serious situation that requires intervention in a range of areas. Government policy clearly requires local authorities to make provision for significant increases in housing supply; however there is no reasonable prospect of achieving this in Guildford for the foreseeable future without casting the net wider and considering sites that are currently outside of the urban and settlement areas. When this is the case the policy of national Government (as contained in the NPPF) is that development proposals for housing, which comply with the principles of sustainable development, should be considered favourably.

Notwithstanding the above, the proposal can be delivered very quickly due to the lack of site constraints, the fact that the BCN site is all in one ownership, there is an existing access onto the road network (B2215), development of the site would have a very limited impact on the local landscape and Green Belt (due to its heavily enclosed nature) and would enable the openness of the Green Belt and its open character to remain and continue throughout the Plan period.

Finally, also in accordance with sustainable development objectives, the emerging Local Plan seeks to support the future economic, environmental and social sustainability of rural settlements, commensurate to their size, character and function.

The scale of the proposed development on the BCN site is commensurate with the size, character and function of Burnt Common/Send Marsh. The settlement is a village and increasing its size by 400 dwellings is potentially excessive in relation to the size of the village. This is demonstrated in a number of ways. Firstly, population; the total population of the village is 2,314 (2011 Census data). The construction of 400 dwellings at Garlick’s Arch would increase that by close to 1,000 population. This is an increase of over 40% (conservative estimate) in the population of the village. This is clearly not commensurate with the size of the village; the Garlick’s Arch site is contrary to Policy 9 of the Draft Local Plan.

Secondly, land take; the proposed allocation at Garlick’s Arch is some 31.7ha. This is close to 50% of the land area of the existing village. Once again, it is simply not possible to conclude that this is commensurate with or proportionate to the size of the village.

Thirdly, the provision of services and facilities; whilst there are local services and facilities the addition of a population of close to 1,000 people would have a significant impact upon those facilities. In allocating land at Garlick’s Arch for such a scale of development without having first considered the need for improvements to local services and facilities and so on is contrary to the aim of sustainable development and contrary to the Council’s own emerging Plan.

That is not all, however.

Policy 9 of the Draft Local Plan goes on to explain that ‘… all development should be appropriate in scale and design, having regard to each settlement’s identity, countryside setting and local character and distinctiveness.’

As discussed in detail in the accompanying landscape appraisal, the Garlick’s Arch site would potentially have a significant adverse impact on the identity, countryside setting and local character and distinctiveness of the Green Belt and the village. This renders it contrary to the objectives of sustainable development and the policies in the emerging Local Plan.

The above evidence weighs very heavily against the allocation of the Garlick’s Arch site for development in the Submission Local Plan.

The above evidence weighs very heavily in favour of the allocation of the Burnt Common Nurseries site for development in the Submission Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- **160718 LVA Report Appendices for Burnt Common Nurseries.pdf** (5.1 MB)
- **160718 Highway Appraisal 3206 TN01 B.pdf** (619 KB)
- **160718 Burnt Common Nurseries Local Plan Representations letter.pdf** (439 KB)
- **160715 BCN Consultation Questionnaire and Comments Form.pdf** (278 KB)
- **160718 LVA Report for Burnt Common Nurseries.pdf** (387 KB)
- **160715 BCN Lambert Smith Hampton Letter.pdf** (99 KB)

---

**Comment ID:** PSLPP16/17276  **Respondent:** 15674689 / Chris Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object as the Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and the Horsleys. 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17281  **Respondent:** 15674689 / Chris Baker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object as over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17378  **Respondent:** 15682305 / Monika Mundy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. These developments place a disproportionate burden on the north east of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Land North of Tannery Lane, Send – representation to the Guildford Borough Proposed Submission Local Plan (Reg 19): Strategy and Sites 2017 Consultation

We write further to our comments on the proposed submission Local Plan: Strategy and Sites 2016 Consultation on behalf of Mr Geoff Cook, in support of residential development at Land North of Tannery Lane, Send. We previously raised concerns that the Plan was not sound due to the lack of sustainability assessment for this site and we consider this to still be the case. Accordingly, we once again put forward the site for development, given our view of its appropriateness for residential use and the contribution it can make towards meeting the housing need of the Borough.

The consultation submission draft acknowledges the need for ‘at least’ 12,426 new homes by 2034. However, the proposed method for delivering this commitment, once again raises concerns regarding the reliance on strategic sites, which as previously highlighted is not considered to be a robust strategy given the uncertainty over their deliverability and timing of delivery.

The information previously submitted (and re-provided with this submission) sets out that the site could accommodate a range of residential development from 50 to 140 dwellings, depending on the housing need of the Borough, and that the site is both suitable, and better placed than many of those proposed in the draft Local Plan submission, to meet this need. It is also noted that the consultation submission draft now proposes an amendment to omit Send Business Park from the Green Belt, bringing this site’s continued inclusion in the Green Belt into question.

Due to the proposed allocation of residential development on Clockbarn Nursery (for 60 homes), the presence of Send Business Centre (to be removed from the Green Belt) and the granting of permission for a marina (14/P/02289) adjacent to the River Wey Navigation, the development would be enclosed on 3 sides by development that falls outside of the
Green Belt. This position reinforces the view that this is an appropriate site for removal from the Green Belt and for residential development, a view the Council strongly endorsed in the first draft of the Local Plan.

As noted above, it is concerning that the methodology of the Housing Topic Paper 2016, along with the sites exclusion from the 2016 Sustainability Appraisal, does not provide the opportunity for the suitability of the site for residential development to be properly assessed. This is despite its inclusion in the draft Local Plan 2014 (and high score in the draft 2014 Sustainability Appraisal). Such a methodology, therefore, calls the soundness of the draft Local Plan 2017 into question.

We consider that proper analysis of the site overcomes the reasons for removing it from the draft Local Plan (since its previous inclusion in 2014), indicated as simply because it is zoned in the Green Belt. It is also noteworthy that the site is previously worked land, being a refilled gravel pit, with a poor 2B+ soil rating, so has no agricultural value.

Having regard to the view that the site no longer accords with the proposed spatial strategy in the local plan, the site is not considered to be any different, in terms of scale, to many of the parcels of land that have been included within the draft. The reliance on moving allocations to alongside the A3 and building large estates would have implications in terms of noise, pollution, and raises concerns that Send village will become a thoroughfare. These issues would not be of concern with the allocation of the Tannery Lane site, particularly given the allocation of the Clockharn Nursery adjacent.

Accordingly, based on a comparative assessment of the capacity of Send to accommodate development, the sustainability of the site, its deliverability and its contribution/impact to the Green Belt it is considered that the site should be included in the Local Plan as a residential allocation contributing to meeting the housing need of the Borough as it:

- Is in a sustainable location (with regard to the economic, social and environmental dimensions);
- Is immediately deliverable;
- Can provide affordable homes for the local community;
- Can provide homes of a high quality design reflecting local distinctiveness;
- Is not of any significant agricultural value;
- Would not harm the purposes of the Green Belt, being surrounded on 3 sides by development outside of the Green Belt;
- Has defensible boundaries encompassed by existing and proposed development;
- Has good vehicular access and linkages to the local highway network;
- Can support good pedestrian permeability to local services and facilities;
- Can support the provision of open space, including the potential expansion of the marina facilities, for the local community;
- Would complement local economic development; and
- Would support cultural education and understanding linked to the River Wey Navigation.

Given the above we are, therefore, pleased to re-provide the following documents, previously submitted in support of the representation to the 2016 consultation:

- A Policy Appraisal;
- A Site Appraisal;
- An indicative layout for a 90 dwelling development; and
• An indicative layout for a 140 dwelling development.

I trust that the information provided will be adequate to demonstrate why residential development should be allocated to the site in the Local Plan and please feel free to contact me should you require any further information of clarification.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
- 14068 - C05B (concept).pdf (1.7 MB)
- Tannery Lane - Policy Appraisal.pdf (6.7 MB)
- Tannery Lane - Site Appraisal.pdf (2.6 MB)
- 14068 - C04B (concept).pdf (1.7 MB)

---

**Comment ID:** PSLPP16/17594  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by
over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.

A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. The vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. There should be no increase for affordability above basic demographic change.
3. There should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market
4. The use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.
The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “The single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.
2. “We were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)
The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/17673 | Respondent: 15693153 / Zurich Assurance Ltd | Agent: Barton Willmore LLP (Sinéad Morrissey) |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |

### Housing

Paragraphs 4.1.5 to 4.1.14 of the Proposed Submission GBLP set out GBC’s spatial development strategy, identifying the scale and distribution of development. They support Policy S2, GBC’s Borough Wide Strategy, which identifies an overall housing requirement throughout the plan period of 13,860 new homes between 2013 and 2033. This equates to 693 dwellings per annum when spread across the 20 year plan period.

It is important to note that the proposed housing target has been set before any unmet needs arising from neighbouring authorities, and that which is expected to arise as a result of the Further Alterations to the London Plan adopted in March 2015 and any subsequent full review of the London Plan to emerge prior to adoption of the GBLP, have been taken into account. On this basis, Zurich notes that GBC will need to ensure that the strategy is justified by up to date evidence, and that appropriate cooperation has taken place with other surrounding planning authorities.

Overall, Zurich is generally supportive of GBC’s intent to ‘boost significantly’ its supply of housing in line with national policy objectives (para. 47, the NPPF), which provides the “exceptional circumstances” necessary to justify undertaking a review of Green Belt boundaries. Zurich welcomes GBC’s efforts to produce a plan that is ‘positively prepared’ in accordance with paragraph 182 of the NPPF by uplifting the borough’s overall housing target, compared to earlier iterations of the plan, so to be commensurate with the full objectively assessed need (OAN) figure of 693 dpa identified in the West Surrey Strategic Housing Market Assessment (SHMA, October 2015). As the GBLP moves forward towards Examination, GBC should ensure that it keeps its evidence base under review and account for the latest population projections released by the Office for National Statistics and current market conditions.

Policy S2 should, however, make clear that the proposed housing target is to be treated as a minimum that GBC should seek to exceed. The following amendments are therefore recommended to Policy S2:

> “During the plan period (2013-33), we will make provision for a minimum of 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The minimum housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision…”
In order to support economic growth and tackle the acute affordability issues that affect the three authorities that make up the South West Surrey Housing Market Area (HMA), Zurich consider it vitally important to bring forward new housing quickly and meet OAN in full. To this end, Zurich also supports the recognition that the development of Broadford Business Park will make a notable contribution towards meeting the Borough’s strategy.

Safeguarded Land

Unlike the Draft GBLP subject to the previous Regulation 18 consultation, GBC has removed the flexibility previously incorporated into Policy S2 through the inclusion of 99 hectares of safeguarded land to be used for various purposes, including residential. Instead, as discussed in more detail below, GBC’s planned housing delivery has relied upon identifying a greater amount of capacity than that required to meet housing need in full.

Paragraph 85 of the NPPF makes clear that when defining Green Belt boundaries, “…where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period…” . Zurich therefore recommends that GBC seek to identify additional safeguarded land on a site specific basis now so to ease transition into subsequent versions of the Local Plan and avoid generating a backlog of housing delivery similar to what currently exists in the borough.

Employment

Informed by GBC’s Employment Land Needs Assessment (September 2015), Policy S2 specifies that 37,200 – 47,200 sqm of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

Zurich is generally supportive of the delivery of new, good quality employment floorspace in the Borough but considers it essential for any such accommodation to be appropriately located so to meet the needs of local communities and benefit from sustainable transport connections so to minimise traffic generation.

Policy S2: Annual Housing Target

Policy S2 anticipates that housing delivery will vary across the plan period. As a result, the annualised housing target gradually increases from 500 dwellings per annual (dpa) in 2018/19 to 790 dpa in 2032/33 so to reflect GBC’s envisaged housing trajectory. The proposed annual housing equates to a total of 10,395 dwellings between 2018 and 2033. This therefore means GBC need to have delivered 3,465 dwellings, at a rate of 866 dpa, in the initial part of the plan period between 2013 and 2017 in order to meet GBC’s overall housing target.

GBC’s most recent Monitoring Report (October, 2015) covering the period 2014/15 (replicated in Table 1 below) notes the performance in terms of net housing completions between 2006/07 and 2014/15.

Recent trends in GBC would suggest that accommodating backlog housing need equivalent to 866 dpa is not achievable in the short term without the necessary improvements to supporting infrastructure. Zurich would therefore invite GBC to reconsider its future housing trajectory and ensure that sustainable growth, commensurate with the rate new infrastructure is brought forward, is incorporated into the medium to later stages of the plan. By the same token, opportunities for GBC to bring forward smaller sites that place a less substantial burden on existing infrastructure should be embraced.

Table 1 – Planning Delivery between 2018 and 2033

Paragraph 4.1.12 explains that GBC will deliver the development identified at Table 1 throughout the plan period. The number of homes identified at Table 1 exceeds the housing requirement set out at Policy S2. GBC’s rationale for this is to “…build flexibility into the Plan and demonstrate that our strategy is capable of delivering the target”. GBC has adopted a mixed approach to its spatial distribution with the Proposed Submission GBLP including a range of prospective sites that vary in size and can be delivered at different stages throughout the plan period. Zurich supports this approach and considers it offers the most robust solution to ensure GBC is able to still deliver its vision in the event sites were not to come forward as planned.

Zurich therefore supports the inclusion of Table 1 within the Proposed Submission GBLP where it fulfils NPPF objectives set out at paragraph 47 by “…identifying key sites which are critical to the delivery of the housing strategy...
over the plan period”. Given the important role Table 1 plays in identifying realistic future growth locations which are critical to meeting GBC’s identified housing need, Zurich recommends the inclusion of Table 1 within Policy S2 rather than as supporting text.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BBP-1 Reg 19 Reps.pdf (1.6 MB)

---

Comment ID: PSLPP16/17667  Respondent: 15693185 / Susan Wade  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Green Belt Development should not be allowed except in truly exceptional cases in an AONB. Use of Brown Field Sites should be maximised

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17712  Respondent: 15697921 / Chris Smedmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to place on record my wholehearted objection to the 2016 Draft Local Plan. I understand that there is some need for new housing and industrial space in the borough, however I have been unable to find evidence supporting the housing needs numbers in relation to these developments and the local villages are nowhere near equipped to deal with the size and locations of the developments proposed, which have not been well thought out and are, in my opinion unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17735  Respondent: 15698753 / Anna Calvert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the disproportionate amount of development in one area of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17741  
Respondent: 15699201 / Robert Griffin  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Another factor contributing to the lack of available housing within Guildford Town, are the large number of buy to let homes rented to Surrey University students. If the University of Surrey were to build the on site student accommodation it has obtained planning permission for, then all of these houses would become available for local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17767  
Respondent: 15701089 / Nick Allen  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am writing in response to the submission of the proposed local plan for Guildford borough.

I am concerned with the volume of development proposed, it appears to be far in excess of any natural growth of the borough.

It appears that the numbers used to justify the development have double counted some sectors which gives the illusion of demand that Guildford is obliged to fill when it does not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17847  
Respondent: 15704865 / Lauren Hunt  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17858  **Respondent:** 15705281 / Anna-Maria Mitchell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the unsustainable development proposed by the local plan. The proposed development of 13,860 new houses would destroy the local communities. The number of houses that are proposed to be built is completely disproportionate to the number of houses which are currently in the villages of Clandon and Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17876  **Respondent:** 15705729 / Martyn Heard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

**I OBJECT ON THESE POINTS**

1) I object most strongly to the proposal to remove Ripley Send and Clandon from the Green Belt.

   There are Brownfield sites that could be utilised, ie at Burnt Common, before considering Green Belt development at Garlicks Arch and Wisley Airfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17884  **Respondent:** 15705729 / Martyn Heard  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; 36% of all the Plan’s new housing is proposed in the Ripley Send Clandon area,

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages,

this mass urbanisation of Surrey villages is deplorable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18106  Respondent: 15705857 / GRH Hampshire  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

It prioritises development in green belt over brownfield sites.

It is skewed deliberately to the east of the borough away from more appropriate sites elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18163  Respondent: 15706689 / Hope Sarti  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT to the disproportionate amount of development in this small area of the borough; The area surrounding East and West Horsley will attract in excess of 5000 new homes, which accounts for over thirty-six percent of development. The area is predominantly rural in structure, nature and environment and does not have the infrastructure to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attended documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18331</th>
<th>Respondent: 15717217 / Ian Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>We have seen a continued increase in the number of new builds in Burpham and this proposal of 2000 houses is far in excess of anything before and totally disproportionate to any other area in the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18413</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt.
in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18460</th>
<th>Respondent: 15724673 / Matthew Bell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18468</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/18496</td>
<td>Respondent: 15725185 / Jackie McKenna</td>
<td>Agent:</td>
</tr>
<tr>
<td>----------------------------</td>
<td>----------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18497</th>
<th>Respondent: 15725185 / Jackie McKenna</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18504</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply.”

The NPPG goes on to state that:

“The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within the development plans.”

The objector has serious concerns over the Planning Authority’s concept of the requirements of the paragraph 47 of the NPPF and the NPPG. There are three significant recent changes to the legal context concerning the meeting of objectively assessed housing need. These are as follows: -

i. Hunston Properties Limited (1) Secretary of State for Communities & Local Government and (2) St Albans City & District Council [2013] EWCH 2678 (admin);

ii. Gallagher Homes Limited (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1783 (admin); and


Paragraph 47 of the NPPF states that: -

“...local planning authorities should... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.”

The Hunston judgement found that in paragraph 26 the qualification contained in the last clause of paragraph 47 quoted is not qualifying housing needs. It is qualifying the extent to which the Local Plan should go to meet the need. To meet assessment objectively arrived at is not affected in advance of the production of the Local Plan which will then set the requirement figure. Colloquially, the ‘objectively assessed need’ is a ‘policy off’ figure where the Local Plan strategic housing requirement is a ‘policy on’ figure that qualifies the full objectively assessed need by reference to the policies of the NPPF. In South Northamptonshire v Secretary of State for CLG and Barwood Homes Limited [2014] EWHC 570. Ouseley J confirmed, in paragraph 32, that: -

“... until the full, objectively assessed needs are qualified by the policies of an up to date Local Plan, they are the needs which go into the balance against any NPPF policies. It is at this stage that constraints or otherwise may apply. It may be problematic in its application, but that is how paragraph 47 works.”

In the Gallagher judgement, at paragraph 31, Hickinbottom J differentiates NPPF guidance on meeting housing need from that previously the case within PPS3 where he states that: -

“Thus, paragraph 47 makes full objectively assessed housing needs, not just a material consideration, but a consideration of particular standing.”

In paragraph 53 of the judgement, the approach of the NPPF is stated as:-

... starting with housing need and requiring justification for any requirement falling short of full and objectively assessed need.” confirming Hunston above.
Paragraph 88 of the judgement confirms that:

“... where there is no Local Plan, then the housing requirement for a local authority for the purposes of paragraph 47 is the full, objectively assessed need.” Confirming Ouseley J above, paragraph 94 states that the balancing exercise required by paragraph 47 cannot be performed without being informed by the actual full housing need. Paragraph 98 highlights the new NPPF world with its greater policy emphasis on housing provision and paragraph 100 refers to the need for the objectively assessed housing need to be ‘a driver’ of the housing requirement target as opposed to, it was conclude, it being a back seat driver in the case in question.

The Local Plan makes provision for some 12,426 new dwellings in the period 2015-2034. This equates to some 654 dwellings per annum. We do not believe that this represents the Full Objectively Assessed Need for Guildford Borough and that it should be significantly increased. The Strategic housing Market Assessment dated September 2015 concluded that the overall housing need in Guildford was 693 dwellings per annum. This resulted in a total housing provision of some 13,167 dwellings in the period up to 2034. The Addendum update recalculated the housing provision and concluded that a lower figure of 12,476 dwellings, a reduction of some 691 dwellings overall was appropriate. However, the Addendum concludes that:

- Housing need to support forecasted jobs growth 555-584 dwellings per annum
- Affordable Housing Need 517 dpa
- Student Need 73 dpa
- C2 Use 73 dpa

We believe that if affordability issues are to be properly addressed in Guildford that the overall housing provision should and must be increased. On that basis we believe that a housing provision of some 700 dpa is a more appropriate figure if housing needs are to be met in full. This figure should be expressed as a minimum.

Recommendation

That the proposed housing provision be expressed as a minimum and that the Local Plan should plan for additional housing of at least 700 dpa or 13,300 dwellings in the period 2015-2034.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Policy S2: Borough Wide Strategy**

The Borough wide strategy sets out the growth targets for housing over the Plan Period. Provision is made for 13,860 new homes; which equates to 693 new homes per year across the Plan Period, based on the conclusions of the SHMA, 2015.
The Annualised Housing Target (AHT) sets out projections for the delivery of 10,395 homes for the period 2018-2019. This, therefore, assumes that the balance of 3,465 homes will have been delivered in the five year period 2013-2018.

The most recent published monitoring report (2014/15, October 2015) shows that for the period 2012/13 through to 2014/15 a total of only 613 homes were delivered. An average of only 204 homes per annum. Paragraph 4.169 of the Housing Delivery Topic Paper, June 2016 (HDTP) states that ‘…completions for 2015/16 are well over 300 homes at nearly 400 homes.’ Taking the upper end figure this still assumes that 2,452 homes will need to be delivered in the two year period 2016/17-2017/18 which; on the basis of previous supply and the Council’s own Annualised housing target is not achievable and will leave a large surplus which is not accounted for in the AHT.

Paragraph 4.156 of the HDTP estimates that the backlog will be 2,019 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in assessing five year supply. It is suggested that for the Draft Plan the HDTP figure is used which would increase the target for 2018-2033 to 12,414 units.

Table 1 (Page 28) sets out Planned Delivery between 2018 and 2033 and represents a total of 13,652 dwellings. Whilst this is in excess of the AHT figure, 8,381 homes relate to large scale strategic sites and a further 715 represent unidentified; windfall and rural exception sites.

The LAA, February 2016 advises that there is in addition extant planning permission in the Borough for 1,408 new homes (excluding Tannery Works). It should not, however, be automatically assumed that all of this potential capacity will come forward in the Plan Period (243 units relate to consents which were granted over 10 years ago).

The Council’s figures reflect the potential for some additional flexibility to take account of changes in circumstances across the Plan period, however, it is not considered to be a credible position to assume as set out in the LAA (Page 17) that there is potential capacity of 15,116 units, as this relies on the delivery of unidentified sites, 100% completion of all strategic sites and the delivery of all extant consents.

This projected capacity figure should not breed complacency particularly given the backlog highlighted above, and the Council’s acceptance in the short term that they won’t be able to meet the NPPF’s requirements for five year housing supply (paragraphs 4.167-4.174).

Paragraph 4.117 of the HDTP acknowledges this point and states “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3…For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.” This text should be specifically reflected in the Local Plan text and policies.

It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery, however, it must be incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

The release of Site A28 represents just such an opportunity for growth in the early part of the Plan period, within a site to be located within the amended urban area and providing capacity for circa 62 units.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17162  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Borough wide strategy sets out the growth targets for housing over the Plan Period. Provision is made for 13,860 new homes; which equates to 693 new homes per year across the Plan Period, based on the conclusions of the SHMA, 2015.

The Annualised Housing Target (AHT) sets out projections for the delivery of 10,395 homes for the period 2018-2019. This, therefore, assumes that the balance of 3,465 homes will have been delivered in the five year period 2013-2018.

The most recent published monitoring report (2014/15, October 2015) shows that for the period 2012/13 through to 2014/15 a total of only 613 homes were delivered. An average of only 204 homes per annum. Paragraph 4.169 of the Housing Delivery Topic Paper, June 2016 (HDTP) states that ‘…completions for 2015/16 are well over 300 homes at nearly 400 homes.’ Taking the upper end figure this still assumes that 2,452 homes will need to be delivered in the two year period 2016/17- 2017/18 which; on the basis of previous supply and the Council’s own Annualised housing target is not achievable and will leave a large surplus which is not accounted for in the AHT.

Paragraph 4.156 of the HDTP estimates that the backlog will be 2,019 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in assessing five year supply. It is suggested that for the Draft Plan the HDTP figure is used which would increase the target for 2018-2033 to 12,414 units.

Table 1 (Page 28) sets out Planned Delivery between 2018 and 2033 and represents a total of 13,652 dwellings. Whilst this is in excess of the AHT figure. 8,381 homes relate to large scale strategic sites and a further 715 represent unidentified; windfall and rural exception sites.

The LAA, February 2016 advises that there is in addition extant planning permission in the Borough for 1,408 new homes (excluding Tannery Works). It should not, however, be automatically assumed that all of this potential capacity will come forward in the Plan Period (243 units relate to consents which were granted over 10 years ago). The Council’s figures reflect the potential for some additional flexibility to take account of changes in circumstances across the Plan period, however, it is not considered to be a credible position to assume as set out in the LAA (Page 17) that there is potential capacity of 15,116 units, as this relies on the delivery of unidentified sites, 100% completion of all strategic sites and the delivery of all extant consents.

The projected capacity figure should not breed complacency, particularly given the backlog highlighted above and the Council’s acceptance that they won’t be able to meet the NPPF’s requirements for five year housing supply (paragraphs 4.167- 4.174.

Paragraph 4.117 of the HDTP acknowledges this point and states “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3…For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.”

It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery, however, it must be incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

The development of Site A45 would also fulfil the objective set out at Para 4.118 of HDTP to “Maintain the Green Belt by limiting growth to those sites that are located in Green (low sensitivity land parcels) only”. Furthermore, maximum use should be made of suitable sites within and adjoining villages as these sites will be deliverable more readily and earlier in the plan period than the large strategic designations.

In focusing on the low sensitivity land it is, however, vitally important that the most effective use is made of those sites when they are released and developed. Our Client considers that more effective use could be made of Site Allocation
A45 and that a more realistic density would be circa 30 units. The boundaries of the site should also be increased to include the full site area of 0.95 Hectares (see attached Plan, Ref: A15517.01.01A).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1477  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**POLICY S2: BOROUGH WIDE STRATEGY**

1.33 The updated policy sets out the growth targets for housing over the Plan Period. Provision is now to be made for a reduced target of 12,426 new homes; which equates to 654 new homes per year across the Plan Period, based on the conclusions of the West Surrey SHMA: Guildford Addendum Report (2017).

1.34 The Annualised Housing Target (AHT) sets out projections for the delivery of 9,810 homes for the period 2019-2034. This, therefore, leaves a shortfall of 2,616 homes.

1.35 The most recent published monitoring report (2015/16, October 2016) shows that for the period 2015/16, 388 homes were delivered, and paragraph 2.9 of the Guildford Borough Topic Paper, Housing Delivery, June 2017 states that only 297 homes were delivered in 2016/17. This leaves 1,931 homes to be delivered over the remaining two monitoring years (965 homes per annum).

1.36 This is not, however, realistic based on current rates of delivery. Over the period 2012/13 to 2015/16 only 1,001 homes were delivered, an average of only 250 homes per annum. This includes a significant uplift in 2015/16.

1.37 The plan does not, therefore, actually plan for the delivery of the reduced housing target of 12,426 homes and at the point of adoption there will be a large surplus not accounted for in the Council’s own Annualised housing target (AHT).

1.38 Paragraph 4.188 of the Housing Delivery Topic Paper (HDTTP), June 2017 estimates that the backlog will be 1,319 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in actually committing to delivering the full housing target during the plan period. The reference at paragraph 4.1.9b to taking account of the deficit accrued until that point does not include the backlog at the point of adoption.

1.39 It is suggested that for the Submission Plan the HDTTP projected backlog figure is included in the AHT which would increase the overall target for 2019-2034 to 11,129 units.

1.40 This is particularly important given the recognition that the Council do not envisage being able to meet their projected annual housing target until 2026/2027.

1.41 Assuming that the Council’s projected rates of delivery are achieved the Council are by this time committing to an additional backlog of 1,028 units. Adding this to the shortfall at adoption would mean a backlog of 2,347 units (3.58 years) to be addressed in the last eight years of the Plan. This would mean committing to the delivery of an additional 293 units per annum on top of the already ambitious targets for the second half of the plan period.

1.42 It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery.
To maximise the delivery of sites in the short term it remains incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

Paragraph 4.143 of the HDTP recognises that “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street). For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.”

In addition paragraph 4.144 of the HDTP advises that the selection of sites in the short-term seeks to “…maintain the integrity of the Green Belt by limiting growth to those sites that are located in Green (low sensitivity land parcels) only.”

In the above context Our Client considers that the Plan should specifically emphasise that maximum use should be made of suitable sites within and adjoining villages as these sites will be more readily deliverable at an earlier stage in the plan period than the large strategic designations.

In focusing on the release of low sensitivity Green Belt land it is, however, vitally important that the most effective use is made of those sites when they are released and developed. Our Client considers that more effective use could be made of Site Allocation A45 (which is on a low sensitivity land parcel) and that a more realistic density would be circa 30 units. The boundaries of the site should also be increased to include the full site area of 0.95 Hectares (see attached Plan, Ref: A15517.01.01A).

UN SOUND: To ensure that the Council’s housing target is suitably robust and capable of reacting to change the AHT should be amended to include the projected backlog at the point of adoption. The Council’s figure of 11,129 additional units should form the basis of the total AHT supply. This will provide clarity and clearer guidance on housing supply and delivery.

The Council should also look to secure a greater contribution from inset villages and infill development within identified Green Belt villages. Specifically, the capacity of Site A45, Land to the rear of the Talbot, High Street, Ripley should be increased to approximately 30 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3526  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Thank you for consulting Highways England in relation to the Guildford Borough Council (GBC) targeted Proposed Submission Local Plan (Reg 19).

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England’s interests relate to the potential impact of development on the A3 and M25.
Overall, in accordance with national policy, we look to GBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Guildford borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3 and M25.

This correspondence follows on from our letters dated 18 July and 5 October 2016, produced in response to the 2016 Proposed Submission Local Plan consultation for which our comments remain (with the exception of Policy A46 which has subsequently been removed from the 2017 Proposed Submission Local Plan).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/3527  **Respondent:** 15746081 / Highways England (Patrick Blake)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**POLICY S2: PLANNING FOR THE BOROUGH - OUR SPATIAL DEVELOPMENT STRATEGY**

**TOPIC PAPER: TRANSPORT APPENDIX 3 (2017)**

**LAND AVAILABILITY ASSESSMENT ADDENDUM (2017)**

It is noted that the Annual Housing Target numbers presented in Policy S2 differ to those presented in the Topic Paper: Transport Appendix 3 (2017) and the Land Availability Assessment Addendum (2017). It would be helpful if this could be clarified.

The housing trajectory contained in the Land Availability Assessment Addendum demonstrates that many thousands of houses are expected to be delivered after the next roads period (2020-2025). Some of these Local Plan sites may be wholly or partially reliant on a potential improvement on the A3 through Guildford. It would be helpful to understand in more detail which development sites are expected to come forward ahead of a potential scheme and which development sites may be dependent upon it.

Owing to the existing A3 congestion issues and the lack of certainty for any potential future scheme on the A3 through Guildford, the management and phasing of the Local Plan developments will be critical.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1239  **Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

GGG objects to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,600 objections made to the 2016 plan.

The OAN “objectively assessed need” figure of 12,426 is far too high. The committee of GGG are very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However, it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning
Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400. We object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted. House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/3248  **Respondent:** 15805921 / Ashill Land Ltd **Agent:** CGMS Consulting (Matthew Roe)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**LAND AT TITHEBARN FARM, SEND**

**Background to the Site**

The site currently comprises a series of sheds, surrounded by hardstanding, which have been in storage use (B8 Use Class) since the 1st July 1990. They were historically used as chicken sheds. The site is located within the Green Belt, and also within the 5 km buffer of the Thames Basin Heath SPA.

A resolution to grant planning permission subject to a S106 was given at Guildford’s Planning Committee on 12th July for the ‘demolition of buildings and the development of 13 residential houses, vehicular access, car parking and associated landscaping’ (Ref. 17/P/00523).
Summary of Representations and Recommendations

We submit these representations on behalf of Ashill Land Ltd, with particular interest to their site at Land adjacent to Tithebarn Farm, Send. The representation is submitted in support of development at this site for the following reasons:

1. Paragraph 89 of the NPPF supports the complete redevelopment of previously developed sites (brownfield land) and the draft Local Plan Policy P2 ‘Green Belt’ should adequately reflect the Framework.

2. Guildford’s housing target within the draft Local Plan needs to set as a minimum requirement and be increased to meet the required housing need in the borough.

3. We suggest a flexible approach to the affordable housing policy to have further consideration to viability and deliverability. In addition, to payment in lieu towards affordable housing taking into account site specific considerations.

4. We recommend that the approach to the redevelopment or change of use of non-designated employment sites is reviewed to take into consideration the conditions of existing buildings for employment uses.

The representations, on behalf of our client, to the draft Local Plan, with regards to the above are set out in the following paragraphs.

Green Belt Allocation and Policy

Draft Local Plan Policy P2 ‘Green Belt’ details that certain forms of development are not considered to be inappropriate development within the Green Belt. Specifically included within the draft policy is the criteria for ‘replacement of buildings’ within the Green Belt. The policy dictates the replacement of a building would be appropriate, provided the new building:

• Would be in the same use;
• Is not materially larger than the one it replaces; and
• Is sited on or close to the position of the existing buildings

However, the criteria is too narrow and does not go far enough to fully reflect the guidance for local authorities included within paragraph 89 of the NPPF, with regard to previously developed land within the Greenbelt. With the above in mind we recommend the following amendments to the wording of the policy:

Furthermore, we would recommend that the policy is broadened to include the tests as set out within paragraph 89 of the NPPF.

Replacement of a building, provided the new building:

• Is on previously developed/brownfield land;
• Is not materially larger than the one it replaces, and
• Is sited on or close to the position of the existing building.

The policy should therefore be amended to ensure consistency with the NPPF, and ensure that development is not restricted at sites, which are considered suitable for development in line with paragraph 89 of the NPPF.

Housing

We support the housing target outlined within Policy S2 ‘Planning for the borough – our spatial development strategy’ to be set as a minimum requirement. The housing target should also be increased. The development of 13 homes at the above site, which is viable, suitable and deliverable for housing development within the next five years, can contribute to this housing need in line with aims of the NPPF.

Loss of Employment Space

Draft Policy E3: ‘Maintaining employment capacity and improving employment floorspace’ as drafted does not identify site specific exceptions. It requires marketing evidence for all sites, which are in employment use, and not designated to
justify their loss. The draft policy requires an element of flexibility in order to be considered sound. It should therefore be amended to state that where it can be demonstrated that the building or site is unsuitable for continued employment use on the basis of the following criteria, employment floorspace does not need to be protected. The criteria comprise:

- The type of employment use;
- The employment generation of sites;
- The suitability and condition of the employment buildings;
- Economic viability for refurbishment;
- The availability and demand for the employment floorspace; and
- Flexibility in employment floorspace.

This will enable brownfield sites within the Greenbelt (i.e. appropriate development under NPPF, Paragraph 89) to be redeveloped where appropriate, such as Tithebarn Farm, and deliver housing.

**Affordable Housing**

We support a more flexible approach to affordable housing provision outlined within the Policy H2 ‘Affordable Housing’ of the draft Local Plan (2017), which takes into account the viability and deliverability of housing schemes, and would not restrict the provision of more housing on sites such as the Land at Tithebarn Farm.

[See Appendix A in attached document]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** 170724_JCG19510__Tithebarn_Farm__Representations_to_the_GB_LPA.pdf (204 KB)
development needs of business and support an economy fit for the 21st century. As with the supply of housing, early
delivery of available and suitable sites should be encouraged to meet the Borough’s development needs as early as
practical in the plan period.

Having regard to the above, we therefore consider that the broad strategy to meet the Borough’s development needs as set
out within Policy S2 is sound, as it seeks to positively meet the objectively assessed housing and employment needs as
identified within the evidence base as required by paragraph 14 of the NPPF. With reference to the tests of soundness set
out at paragraph 182 of the NPPF, we therefore consider the broad strategy in Policy S2 to be sound, as it is positively
prepared, justified and consistent with national policy. Notwithstanding, we note that delivery of new
residential dwellings is anticipated to be below the annual average requirement of 693 dwellings per annum in the early
years of the plan, and in this context promoting an maximising the delivery of available sites which do not rely on
significant infrastructure should be particularly welcomed in order to minimise the resulting cumulative deficit against
this annual average requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Common Ground (SOCG) with Highways England, the Surrey County Highway Authority and Guildford Borough Council in respect to the delivery of the slip roads.

2.2 The site is located immediately to the northwest of the A3 (Ripley Bypass), on the southeastern edge of Send Marsh, approximately 2km to the southwest of Ripley and 6km to the northeast of Guildford. The site largely comprises agricultural land, with a relatively small area of commercial land in the centre of the site. High voltage electricity pylons run through the centre of the site across its full length. A substantial tree belt, comprising an element of ancient woodland, screens the northwestern corner of the site, with another patch of woodland located on the southeastern boundary with the A3. A small brook also runs through the eastern portion of the site.

2.3 An extensive range of technical work and ongoing engagement with Guildford Borough Council has informed an emerging development strategy for the site, which is presented in the enclosed Vision Document. This document considers the key opportunities and technical considerations relevant to the site and the valuable contribution that development of the land at Garlick’s Arch can make towards meeting Guildford’s identified development needs.

2.4 Following previous representations and ongoing engagement with the Council, we welcome the proposed allocation of this site in the draft Local Plan for residential-led development. We set out below our support for the broad strategy and specific elements of the draft Local Plan. Where considered necessary, we also suggest alterations to the latest version of the proposed policies and supporting text to ensure the Plan is sound.

**Policy S2: Borough Wide Strategy**

**Overall Housing Requirement**

3.1 We note that following the publication of the 2017 Addendum to the West Surrey Strategic Housing Market Assessment (SHMA), the proposed housing requirement has decreased by 1,434 dwellings, from 13,860 in the June 2016 version of the Plan to 12,426 net additional dwellings within the June 2017 version, as a result of altering the previous 20 year plan period from 2013-2033 to a 19 year period of 2015-2034. This in turn reduces the annual requirement from 693 dwellings per annum to 654 dwellings per annum. However, consistent with the conclusions drawn at the Examination in Public (EiP) of the Waverley Local Plan, the base date for the Housing Market Area should be consistent. Accordingly, Guildford Borough Council should ensure that the actual target housing number set within the Local Plan Accounts for any housing provision that has not been delivered to date.

3.2 Notwithstanding, the proposed 12,426 dwelling requirement for the Plan Period matches the Objectively Assessed Housing Need figure identified within the 2017 Addendum to the West Surrey Strategic Housing Market Assessment, and on this basis we welcome the fact that the latest version of the Plan still seeks to meet Objectively Assessed Needs in accordance with the requirements of paragraph 14 of the National Planning Policy Framework (NPPF).

3.3 However, we encourage the Council to consider the inclusion of a buffer within the overall housing requirement for the plan period, in order to ensure the identified Objectively Assessed Need of 12,426 dwellings is met. We understand from the commentary within the June 2017 Sustainability Appraisal Update that the latest version of the Plan allocates some 13,600 dwellings, which provides a 9% buffer above the proposed minimum requirement of 12,426 dwellings for the plan period. However, in order to ensure Objectively Assessed Needs will be met, and to deliver the significant boost to the supply of housing advocated by paragraph 47 of the NPPF, in our view it would be beneficial to incorporate a buffer to the 12,426 dwelling Objectively Assessed Need within the minimum requirement figure itself, in order to ensure the Plan is robust and will fully deliver the Borough’s housing needs. We therefore encourage the Council to increase the minimum requirement figure set out at Policy S2 to ensure it exceeds the identified Objectively Assessed Housing Need.

3.4 Furthermore, we note that the identified housing requirement within Policy S2 does not seek to meet any unmet need arising from elsewhere in the West Surrey Housing Market Area. In particular, whilst Guildford and Waverley are apparently seeking to identify a housing requirement within their respective draft Local Plans which matches their Objectively Assessed Housing Needs, Woking Borough Council’s adopted 2012 Core Strategy includes a housing requirement of just 292 dwellings per annum, which is some 225 dwellings per annum lower than the Borough’s full Objectively Assessed Need as identified within the 2015 West Surrey Housing Market Assessment. We are unaware of any intention for Woking to seek to update its housing requirement in the near future. It would therefore be reasonable to conclude that there is an unmet need of 225 dwellings per annum within the West Surrey Housing Market Area. Having
regard to the Duty to Cooperate and the emphasis within the NPPF of seeking to meet Objectively Assessed Needs within the housing market area, and the significant negative socio-economic consequences of failing to do so. As proven by recent Examinations e.g. Waverley and Mid-Sussex it is a requirement to meet a significant element of any un-met housing need carried from neighbouring boroughs in accordance with the duty to cooperate advocated within the NPPF. The Inspector examining the Waverley Borough Local Plan has indicated that he expects Waverley Borough Council to explore meeting up to 50% of this unmet need and thus to ensure soundness of the Plan, Guildford, by implication should explore meeting the balance of this unmet need.

3.5 We note that in similar circumstances, the Inspector examining the Mid Sussex District Plan recently concluded that it would be unsound for Mid Sussex to fail to accommodate a significant portion of unmet housing need arising from its neighbours within the same housing market area in its emerging District Plan, and thus concluded that the proposed housing requirement within the draft Plan should be increased accordingly.[1]

3.6 Consequently there is a clear imperative for Guildford to explore all reasonable options to facilitate the adoption of a housing requirement that includes the appropriate portion of this unmet need. Whilst the 2017 Sustainability Appraisal Update considers the potential for the quantum of unmet need to change taking account of latest projections and forecasts, we note that the National Planning Practice Guidance[2] indicates that housing assessments are not automatically rendered out of date every time new projections are released, and thus the 2015 SHMA may still be considered a reasonable indication of housing needs across the West Surrey Housing Market Area. Meanwhile, whilst the 2017 Sustainability Appraisal Update considers the possibility that Woking’s emerging Site Allocations Plan could allocate sufficient land to exceed the adopted Core Strategy housing requirement, there is no evidence that this is a reasonable likelihood, and indeed the most recent consultation document published by Woking Borough Council indicates that the preferred strategy is to only meet the Core Strategy requirement. It is therefore highly likely that this need will remain unmet unless it can be accommodated by Guildford and/or Waverley.

3.7 In our view, to date, Guildford Borough Council has provided insufficient justification as to why it cannot accommodate at least a portion of this unmet need arising from Woking within the Borough over the forthcoming plan period, as required by paragraphs 47 and 182 of the NPPF. A failure to meet this unmet need would be likely to result in worsening affordability across the West Surrey Housing Market Area and may result in internal migration from Woking to other nearby authority areas such as Guildford Borough, thereby creating additional pressures on neighbouring areas. We therefore encourage the Council to increase the identified housing requirement in Policy S2 to ensure the unmet need within the wider Housing Market Area is met in full. This would likely only require a modest increase in Guildford’s minimum requirement and thus would not necessitate a fundamental adjustment to the proposed spatial strategy, but importantly would ensure the needs of the wider Housing Market Area are met in full.

3.8 We note that the latest amendments to the draft Plan as set out in the June 2017 consultation document seek to reduce the total number of Gypsy & Traveller pitches being planned for over the plan period from 73 as identified in the June 2016 consultation document to 58 pitches in the current document. Meanwhile the total number of plots for Travelling Showpeople being planned for within the Plan remains at 8 permanent plots, albeit the proposed phasing of these plots between 2012-2017 and 2017-27 has been deleted from the latest version of the Plan, presumably due to a lack of delivery to date.

3.9 These requirements would appear to be broadly consistent with the need identified within the 2017 Guildford Borough Traveller Accommodation Assessment. Whilst the need identified specifically for those meeting the planning definitions for ‘Gypsies & Travellers’ and ‘Travelling Showpeople’[3] is significantly lower than is currently being planned for within the draft Local Plan, and notwithstanding the requirements of Policy B of the Planning Policy for Traveller Sites, we note that those who do not meet the planning definition still have a specialist housing need that will need to be accommodated, and which has not been specifically accounted for within the Council’s Objective Assessment of Housing Need. As such, the proposed requirements for Gypsy & Traveller and Travelling Showpeople provision within the latest version of the Local Plan would appear to be broadly in line with the need identified within the Council’s evidence base, albeit the Gypsy & Traveller requirement in Policy S2 would appear to be some 5 pitches higher than the identified need over the plan period.
3.10 We set out further comments regarding the overall strategy and spatial distribution of Gypsy & Traveller pitches and Travelling Showpeople plots below in relation to Policies H1 and A43.

Annual Housing Target

3.11 The proposed amendments to the June 2016 draft of the Local Plan, as set out in the current consultation document, include an updated annual housing requirement table within Policy S2. This takes account of the updated housing requirement of 12,426 net additional dwellings for the plan period and amends the previously proposed annual requirements. In summary, a phased annual housing requirement is proposed, starting at 450 dwellings per annum in the first two years following adoption (2019/20 to 2020/21), and gradually increasing to 850 dwellings per annum in the final three years of the Plan (2031/32 to 2033/34).

3.12 Irrespective of our earlier comments in respect of the overall housing target being increased to account for a consistent base date and the duty to cooperate, the total requirement for the period 2019/20-2033/34, based on the sum of the annual requirements set out in the Annual Housing Target table at Policy S2, is 9,810 dwellings. This results in a residual requirement for the remainder of the plan period (2015/16-2018/19, prior to adoption) of 2,616 dwellings (equivalent to an annual average requirement of 654 dwellings per annum). This is equal to the annual average requirement based on a consistent rate of delivery of the 12,426 dwellings over the 19 years of the Plan. The latest housing supply figures set out in the Council’s June 2017 Housing Delivery Topic Paper indicate that against this 654 dwellings per annum average requirement, in 2015/16-2016/17 just 678 (381+297) net additional dwellings were completed over the first two years of the Plan, resulting in a residual 1,938 dwellings and an adjusted annual average requirement for the remaining pre-adoption period (2017/18-2018/19) of 969 dwellings per annum. Clearly, this would require a significant increase in delivery rates in the remaining years up to 2019/20, and a significantly higher annual completion rate than that set out for the initial years of the Plan following adoption. Indeed, the level of completions required to ensure there will not be a housing supply shortfall on adoption of the Local Plan in 2019 (at 969 dwellings per annum, taking account of the dwellings delivered in 2015/16-2016/17) is higher than the level of delivery anticipated at any point within the remainder of the plan period, based on the Annual Housing Target table at Policy S2. Consequently, in our view it will be necessary to significantly increase the annual housing requirements in the years following adoption of the Plan in 2019 in order to address the likely shortfall in the first 4 years of the Plan.

3.13 With regard to the specific annual requirement figures set out within the latest table at Policy S2, we are concerned that delivery within the early years of the Plan is expected to be very low, with an initial requirement of 450 dwellings per annum in the first two years following adoption, followed by a requirement of 500 dwellings per annum in the subsequent three years. The annual requirements identified within the table do not exceed the annual average requirement of 654 dwellings per annum until 2026/27, some 12 years following the start date of the Plan. By this point the cumulative requirement based on the phased (artificially constrained) annual requirements suggested would be 6,866 dwellings for the first 12 years of the Plan, some 982 dwellings (equivalent to 1.5 years) below the cumulative requirement based on an annual average requirement of 654 dwellings per annum, notwithstanding any unmet need to date. We note that paragraph 4.1.9b explicitly states that this phased approach has been suggested “in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption”. We consider this approach to be unsound, as the Council is artificially constraining the requirement figure to a level which it considers to be achievable based on its preferred development strategy, in order to be able to demonstrate a 5 year supply of housing as required by paragraph 47 of the NPPF. If Local Planning Authorities were permitted to take this approach, the requirements of paragraph 47 and associated sanctions contained within paragraph 49 of the NPPF would be rendered meaningless, as they would be able to simply adjust their annual requirements to suit the predicted housing trajectory, provided the overall housing requirement for the plan period was met by the end date of the plan, thereby ensuring there was never a shortfall in the 5 year supply.

3.14 In our view, the proposed approach of setting constrained variable annual housing requirements, as opposed to relying on the annual average requirement derived from the overall requirement of 12,426 dwellings for the plan period, is unsound, as it would fail to ensure Objectively Assessed Needs were met within the early years of the plan period, contrary to the requirements of paragraph 47 of the NPPF. In the context of national guidance in the NPPG that Plans should generally be updated every 5 years[4], it is highly likely that the Local Plan will be reviewed before the higher delivery rates anticipated in the later years of the Plan are achieved. Consequently, when the Local Plan is reviewed, the artificially constrained housing requirements are highly likely to result in a situation where there is a significant deficit against the Borough’s identified housing needs. In this regard, we consider that the approach would be contrary to
national planning policy and thus unsound, as it would patently have failed to meet the full, objectively assessed needs for market and affordable housing in the housing market area as required by paragraph 47 of the NPPF.

3.15 Meanwhile, the phased requirement figures set out in the latest version of the table at Policy S2 represent only a relatively modest uplift in current delivery rates and would actually be a decrease from the 654 dwellings per annum requirement identified for the first 4 years of the plan period prior to adoption.

3.16 Based on the trajectory set out within the Council’s 2017 addendum to the Land Availability Assessment, even when assessed against the significantly constrained annual requirements proposed in the table at Policy S2, the cumulative deficit against the minimum requirements would not be eliminated until 2025/26. Consequently the Council would still be unable to identify a sufficient supply in the early years of the plan period, even with the artificially constrained annual requirements, and this cumulative shortfall would persist beyond the likely date of a review of the Local Plan. Clearly, any increase in the overall minimum requirement as discussed above would further exacerbate this issue.

3.17 The above points highlight the significant need to identify a sufficient supply of housing within the early years of the Plan. Clearly, the artificial constraint of the housing requirement in the first 8 years of the Plan following adoption will have significant implications in terms of affordability and other negative socio-economic impacts as the Objectively Assessed Housing Need will not be met in this part of the Plan. The 2017 Sustainability Appraisal Update highlights the potential risk to delivery in the early years of the Plan given the reliance on a number of large, strategic sites. Consequently we consider that this would not achieve a significant boost to the supply of housing as required by paragraph 47 of the NPPF and would thus be contrary to national planning policy. It is therefore imperative that sufficient small and medium scale sites are allocated that can be delivered in the early years of the Plan to address these issues. In this regard, the land at Garlick’s Arch (as identified at Policy A43) will make a significant contribution towards the supply of housing in the early years of the Plan, and can deliver at least 400 dwellings (a significant portion of the annual requirement) within the first five years following adoption due to its relatively unconstrained nature and availability for development. The capacity of such sites should be maximised in order to ensure a sufficient short term supply of housing, and the land at Garlick’s Arch could potentially deliver additional housing than the 400 dwellings identified in this regard.


[4] Reference ID: 12-008-20140306

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17201  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

There is no such thing as sustainable development. Global Warming is just one example of how we have ‘developed’ too much already. The proposed developments are not self-contained and will give rise to more traffic and stress on all the adjacent towns and villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17692  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the premise of the Plan which is predicated on future population growth figures which can not be demonstrated to be realistic. This calls the whole document into question, thus the Plan is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15557  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

OBJECT. The number of homes – 13860 – has not been properly evaluated by councillors despite numerous requests. Major structural change cannot be justified without substantiated numbers.

Independent consultants have provided detailed criticism. Housing need thus demonstrated, proves no need to build on Green Belt

Guildford appears unfairly to be accepting Woking’s designated ‘need’
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1498  Respondent: 15977889 / Charles Kimpton  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17199  Respondent: 15995585 / Helen Ridley  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Finally, I wish to emphasise my concern over the inevitable effect on local wildlife as a result of damage to the Ancient Woodland.

I beg you to think carefully before causing irreversible damage to our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18664  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2. The Local Plan places growth above: the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1500  Respondent: 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  Agent: Turley (Donna Palmer)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1. Introduction

1.1 These representations have been prepared by Turley on behalf of Bloor Homes Southern in respect of the Guildford Borough Proposed Submission Local Plan (June 2017). The consultation is targeted to the proposed changes to the Plan since the 2016 consultation and the revised evidence base documents.

1.2 Our client has important land interests in the Local Plan area, in particular at Nutbourne Farm. This lies to the east of Gosden Hill Farm, Guildford and falls partly within draft Policy A25 within the submission Local Plan for c. 2000 homes, employment, retail and a school. A Site Location Plan identifying the site is provided at Appendix One. As such this response focuses on issues which particularly affect the site.

1.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly.

Policy S2: Planning for the borough – our spatial development strategy

Housing Requirement

2.1 The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

2.2 The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

2.3 The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

2.4 It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.
2.5 As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

2.6 The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

2.7 Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part 1 Inspector has applied an uplift of 25%.

2.8 At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities. In particular Woking’s Core Strategy (2012) sets out its housing requirement as 292 dpa, some 225 dpa below the OAN as established in the 2015 West Surrey SHMA.

2.9 Notably this issue has been specifically considered by the Inspector at the recent Waverley Local Plan EIP hearing sessions. During these hearings, the Inspector clearly indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking. From our involvement in the Waverley Local Plan sessions it is expected that Waverley will be required to accommodate at least 50% of the unmet need from Woking, which amounts to 83dpa.

2.10 Looking more widely it is also important to recognise the relationship the Borough has with London and the unmet needs associated with it. The Inspector’s Report for the Local Plan found that the Greater London Authorities could not meet its objectively assessed need of 52,000 dpa, nor its target of 49,000 dpa, as it has an identified capacity of 42,000 dpa only.

2.11 If the reduced OAN for Guildford itself can be justified through the SHMA addendum (although as discussed we have concerns regarding the soundness of this approach) then consideration should have been given in any event to the ability of the Borough to meet the unmet needs of adjoining authorities, in particular Woking. It is apparent that this approach has not been followed.

2.12 Paragraph 4.1.9a of the Local Plan states:

“The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.13 Clearly therefore there is no justification to restrict the housing requirement on the basis of housing supply. As such it is considered the Plan should make provision for its full OAN and explore its ability to accommodate the needs of adjoining authorities. Additional allocations should be made to meet this requirement. At the current time the plan is considered to be unsound in that it is not justified, effective, positively prepared or consistent with national policy.

The phasing of development as set out in the Annual Housing Target table

2.14 We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In
addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

2.15 The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. Indeed, given the undersupply which has already taken place, this situation has already been occurring and would be further exacerbated by the proposed approach taken in the Local Plan. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

2.16 The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequently this raises concerns over whether any accrued shortfalls can be resolved.

2.17 If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

2.18 Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

2.19 The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

2.20 Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though if the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

2.21 We note that paragraph 4.1.9a of the Proposed Submission Local Plan states:

“This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”
2.22 We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

**Policy S2** – The Council should endeavour to meet its full OAN and seek to assist in meeting the needs of adjoining authorities, in particular Waverley Borough Council, where possible. Further allocations should be made to provide flexibility in the delivery of the Plan and to meet the required increased housing requirement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/925  **Respondent:** 17164033 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

1. **Policy S2: housing number**

I OBJECT to the revised target of 12,426 homes, since:

- This remains based on a formula that has not been made public and therefore cannot be verified and has never been scrutinised either by Councillors or the public, despite many strenuous, well-documented efforts to get it revealed;

- The draft Plan advances no justification for identifying the unconstrained OAN with the housing target and is unsound in this respect;

- Fundamental flaws in the SHMA’s OAN calculations have, in any case, been exposed in extremely detailed studies, e.g. by Cllr David Reeve and by Neil MacDonald of NMSS. These suggest not only that the numbers are excessive but that the target for the whole plan period is a moving one, subject to phased building and progress on infrastructure.

- A more realistic target with relevant constraints applied would potentially remove the need to build on green fields and, at a stroke, answer many other objections to the Plan.

Separately, I OBJECT that S2 fails to amount to a policy. Whether or not one agrees with the housing numbers or with a phased approach, it does not set out clear and transparent planning goals that can be understood and monitored. Using this draft, it would never be possible for the Government or public to say whether Guildford is on target or not.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/190  **Respondent:** 17240961 / Jan Benton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
In view of flawed new evidence, Guildford's plan to build 12,426 new homes is excessive and will result in the loss of green belt and green spaces, and also increased congestion. Guildford needs homes in the centre which would not add to congestion on already very busy roads. Guildford doesn't need more shops but flats and houses instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/275  Respondent: 17248705 / Sarah & Ray Relf  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Like most local residents, and as detailed by both Parish Councils, we believe that the conclusions of the revised SHMA are still seriously flawed, and therefore, the proposal to build 12,426 new homes in the borough remains excessively high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/335  Respondent: 17267393 / Steve Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the proposed new homes figure of 654 per annum. Although reduced from 693 the JWRA feel that such a high level of housing cannot be justified, particularly in the light of the new economic situation. I also feel that the figures are based upon erroneous assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/349  Respondent: 17267745 / Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed new homes figure of 654 per annum. Although reduced from 693 the JWRA feel that such a high level of housing cannot be justified, particularly in the light of the new economic situation. I also feel that the figures are based upon erroneous growth assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/572  Respondent: 17291393 / Mina Amin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I have been informed about Guildford's proposal for more than 12,426 homes (plus a buffer of 1,555 homes).

I have done some research and have found out that it is excessive and will result into extra congestion which is already severe. There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies so building that many new homes is in fact excessive and will result in needless loss of Green Belt of Guildford.

Please consider this as my objection to the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/573  Respondent: 17291425 / Chris Ogle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I am opposed to the proposed changes to the local plan because:

I believe the new evidence for an additional 12,426 homes is flawed because it is based on inflated estimates of population growth.

The council need to take note that Guildford simply cannot continue to expand and therefore should not try to make this happen. The traffic congestion in the town centre is ridiculous and the resulting pollution is dangerously high. The council are not doing anything to seriously address this. There needs to be far more support of alternatives to the car and in particular should support cycling. Without this traffic levels will just continue to increase and will not reduce as the council project. This is clearly an absurd assumption.

Electric bikes could make a huge difference to traffic levels but while the I have heard some councillors talk about supporting electric bikes nothing has happened in the last two years.

Massively increasing the retail space in Guildford is irresponsible given the council’s inability to find a solution to the town’s traffic problems.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3509  Respondent: 17301249 / Elliot Sinclair  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

In view of the new flawed evidence, Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of green belt and character whilst increasing congestion. This cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/689  Respondent: 17301473 / Lynda Turner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy S2 – the 654 homes per year that the Plan intends to deliver over the period of 2015 – 2034

This reduced number is still far too high and doesn’t take into account the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in population.

I strongly object to the calculation of assessed need for housing and other development in the area and the vastly disproportionate impact of the Local Plan proposals on the communities in The north of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2713  Respondent: 17304257 / Obsidian Lands Promotion (Guildford) Ltd (Philip Scott)  Agent: Obsidian Strategic (Philip Scott)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
S2: Borough Wide Strategy

We do not set out in detail here every point of contention with the PSLP Housing Strategy nor do we necessarily object to other individual proposed submission allocated housing sites. Those detailed matters will follow in due course through the Examination.

The main thrust of our objections to Proposed Submission Policy S2 is threefold:

1. Housing Need has been reduced significantly from the July 2014 (Regulation 18) and June 2016 (Regulation 19) versions of the Draft Local Plan (Regulation 18) at the very time when housing need both regionally and nationally appears to be very substantially increasing. We find this approach perplexing and we question its credibility and desirability.

2. GBC's Housing Land Supply and proposed housing allocations have altered dramatically from the July 2014 (Regulation 18) and the June 2016 (regulation 19) versions of the Draft Local Plan. Not only is there a significant reliance on major strategic housing allocations which will take many years to deliver housing, but the housing delivery rates are now weighted to the back end of the Plan period exacerbating still further the previous accrued under-delivery of housing in the borough; and

3. In light of the above, smaller and modest sized sites which are deliverable and which the Local Plan evidence base show can be delivered without causing significant harm, have been omitted from the emerging Local Plan at the very time when they could help GBC meet its (and neighbouring authorities) acute housing needs.

The Borough Council openly acknowledges that it has accrued a very significant housing delivery shortfall moving into the Local Plan review process. In that regard, the Borough Council has approximately 3.2 years supply of housing land against the Government's minimum requirement of 5 years housing land supply.

Despite the context of housing delivery under-performance, GBC proposes to reduce the Plan period by one year and its start date has been rolled forward by 2 years. In this respect, we are concerned that there is no credible explanation offered to indicate why the Plan period has been reduced in mid-Plan making process. This change to the Plan period has also been accompanied by a very significant reduction in the overall housing requirement during the Plan period from 13,860 to 12,426 dwellings (a reduction of 1,434 dwellings). This very sizeable reduction comes precisely at a point in time when housing need at the local and national level is so acute. Furthermore, the proposed change to the Plan period appears to be out of step with the Strategic Housing Market Assessment (SHMA) and the Housing Market Area (HMA) which relate to the period 2013 to 2033.

The West Surrey SHMA itself has been partially updated since the July 2014 Regulation 18 and June 2016 Regulation 19 versions of the Local Plan. We also note that the Guildford Addendum Report (2017) takes account of the latest population and household projections, the latest 'post-Brexit' economic projections, and the 2015 mid-year population estimate. It is highly notable that the Addendum Report has resulted in a reduced Objectively Assessed Need ('OAN') for Guildford borough from 693 homes per year (2013 - 2033) to 654 homes per year (2015 - 2034). We struggle to understand how such a dramatic reduction in assessed housing need in Guildford borough bears any resemblance to the reality of the housing market in this part of the South East of England.

We consider that there are a number of in-principle matters for the examination to address in this regard.

Firstly, given the acute need for housing locally (and regionally) including record need and waiting times for affordable housing, together with significant unmet housing need in neighbouring Woking and Waverley boroughs, we question how such a dramatic reduction in the OAN is credible yet alone desirable? A further matter which we will seek to address at the examination is that Addendum Report appears to relate solely to Guildford borough rather than the wider strategic West Surrey SHMA area. The approach by GBC to calculating the revised OAN must brought in question especially in light of the duty to cooperate obligation.

Finally, on this particular matter, we question whether the approach taken by GBC to housing need and the PSLP's approach to housing delivery through the Plan period is in accordance with the Government's advice contained in the National Planning Policy Framework and the Planning Practice Guidance ('PPG').
GBC's Housing Strategy is heavily reliant upon the delivery of several major draft housing allocation sites to bring forward a substantial proportion of new homes during the Plan period. GBC was also at pains throughout the PSLP committee debating process to assure elected Members, stakeholders, and local communities that the major housing allocations would only come forward when accompanied by necessary on and off-site infrastructure (including, but not limited to, new roads, utilities, and school provision). Consequently, GBC's Housing Strategy in the PSLP (Regulation 19) is predicated on all necessary infrastructure required to facilitate the major housing site being delivered at the front end of housing scheme delivery.

The Housing Strategy has therefore been modified to illustrate that housing delivery on those major sites will be significantly delayed and as a result the PSLP housing strategy assumes a significant weighting of annualised housing delivery towards the back end of the Plan period.

We consider the proposed approach to the borough's housing delivery will only serve exacerbate the acute need for housing (including affordable housing) in the borough which is already failing to perform against local targets and the Government's 5 year housing land performance requirements. Indeed, not only is the Borough Council moving towards an Examination with a sustained housing land supply shortfall when measured against its 5 year housing land supply target but the Council is also proposing a housing delivery strategy which will result in an additional accumulated shortfall of 1000 dwelling units up to 2026 against its own annualised OAN housing target (until the draft allocated major housing sites come on stream from 2026 onwards):

2019/2020 200 unit shortfall
2020/2021 200 unit shortfall
2021/2022 150 unit shortfall
2022/2023 150 unit shortfall
2023/2024 150 unit shortfall
2024/2025 100 unit shortfall.
2025/2026 50 unit shortfall.

This annualised shortfall in housing delivery will be greater still if the Examination Inspector finds against GBC's revised OAN methodology.

Despite this lamentable context, sites with potential to deliver housing in the first five years of the Plan period have been omitted from the emerging Local Plan despite being draft allocated from the 2014 draft Local Plan. For example, sites such as Pond Farm and Land South of New Pond Road (Site No. 80 (SHLAA site reference 2241) immediately adjacent to and contiguous with the built form and settlement boundary of Farncombe have been identified as part of the Borough Council's housing evidence base and the Green Belt and Countryside Study as being suitable to deliver new housing.

**Road** (Site No. 80 (SHLAA site reference 2241)) immediately adjacent to and contiguous with the built form and settlement boundary of Farncombe have been identified as part of the Borough Council's housing evidence base and the Green Belt and Countryside Study as being suitable to deliver new housing.

In this context, the Promotion Site was draft allocated as part of site **No. 80 (SHLAA site reference 1140 and part site reference 2241)** in the Regulation 18 draft Local Plan: Strategy and Sites published for consultation in July 2014 as being suitable to deliver housing. The draft allocation site being 16 hectares of land to the south of New Pond Road (B3000) and intersected by Furze Lane. The wider site having been assessed by Pegasus Planning on behalf of the Borough Council as not contributing to the purposes of the Green Belt by virtue of its defensible boundaries and being well contained.

Site No. 80 was discounted from the Regulation 19 draft Local Plan (June 2016) absent of any fresh technical evidence to justify its omission.
The Promotion Site lies contiguous with the established form of Farncombe which itself lies in the adjoining borough of Waverley.

Waverley borough is also experiencing an acute need for new housing and its own Local Plan has been recently subject to Examination in July 2017 during which the Examination Inspector (Mr Jonathan Bore) has acknowledged that he is minded to recommend that Waverley Borough’s annualised housing target is increased significantly from 19 dwellings per annum to around 80 dwelling per annum (the precise amount is to be confirmed). The Waverley Borough Local Plan Inspector also questioned Guildford Borough Council during the Examination on its ‘duty to cooperate’ role with Waverley Borough Council given the absence of any truly cross boundary strategic housing sites or apparent sharing of housing land supply. In this particular context, Farncombe is a sustainable settlement that benefits from a wide range of services and amenities including a railway station. Land at Pond Farm and Land South of New Pond Road is contained on its boundaries by physical built features including; New Pond Road (B3000) along the entirety of the northern boundary, the Portsmouth to London Waterloo mainline railway (to the eastern boundary) and established residential development (immediately south). The Promotion site itself is formed in two parcels intersected by Furze Lane which connects the village to the busy B3000. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the Promotion Site entrance.

The Promotion Site is set within the designated Surrey Hills AONB and the Green Belt which covers (washes over) all the land between Farncombe and Guildford. However, in respect of the AONB, two independent landscape appraisals have found that site No. 80 does not contribute to the characteristics and qualities of the wider Surrey Hills AONB and is impacted and influenced by the urban characteristics of the adjoining settlement. Furthermore, the Surrey Hill AONB office in its written comments to planning application reference WA/2014/1330 approved for 80 dwellings (immediately adjacent to the Promotion Site), acknowledged that the area south of the B3000 did not significantly contribute to the characteristic and qualities of the Surrey Hills AONB.

In respect of the Green Belt, it is highly notable that the Borough Council's Green Belt and Countryside Study which is an important evidence based document also indicates that Site No. 80 does not perform strongly when measured against the purposes of including land within the Green Belt.

Nevertheless, the site promoters have commissioned further independent assessment of the site in terms of its visual impact on the landscape, its role as contributing to the purposes of the Green Belt and other technical matters including flooding and flood risk and we can confirm there is no impediment to delivering housing on the Promotion Site.

In term of the housing delivery and subject to the proper planning, design and layout of the Promotion Site we estimate the site can deliver between 90-100 dwellings including affordable housing at full policy rate, whilst still allowing for generous on-site open space and areas that will be kept free to allow for flood risk and established trees to be retained. The additional technical work commissioned by the Site Promoter effectively supports the earlier evidence base work undertaken by the Borough Council which led to the site's draft allocation.

It is also evident that by allocating the promotion site, the Borough Council would be assisting housing need in Guildford Borough but also Waverley Borough which is a central objective of the duty placed on local authorities to cooperate in delivering housing land and meeting the need for housing at a more strategic level.

The promotion site is accessed via Furze Lane in an accessible location on the edge of a large sustainable village which has a wide range of services and facilities including a railway station which provides excellent links to Guildford (6 minutes) and onwards to London Waterloo. The settlement also offers local opportunities for employment and employment creation as part of a sustainable existing settlement. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the site entrance. In all these respects, Land South of New Pond Road is ideally placed to deliver a sustainable and deliverable residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Duty to Cooperate

We have already set out our concerns regarding the Council's duty to cooperate in our representation to Proposed Submission Policy S2:Borough Wide Strategy and specifically GBC's approach to re-assessing housing need in isolation from neighbouring borough and districts. In addition, we are mindful that GBC's duty to cooperate was questioned as part submissions made to the Waverley Borough Local Plan Examination in July 2017. During the Waverley examination, the appointed Inspector (Mr Jonathan Bore) questioned GBC's representatives who were in attendance at the Examination. The Waverley Local Plan Examination Inspector was very keen to understand why Guildford Borough Council does not appear to have identified land or taken on unmet housing need from neighbouring boroughs in its emerging Local Plan. GBC's response at the Waverley Local Plan Examination was, in effect, to say that Guildford borough was highly constrained and the ability therefore to take unmet housing need from neighbouring authorities was not possible. This approach, should it be carried forward into the Guildford Local Plan Examination, is simply not adequate.

Firstly, all local authorities forming part of the West Surrey SHMA (and several authorities beyond this area) have constraints whether those constraints include metropolitan Green Belt, AONB, AGLV, Thames Basin Heaths SPA etc. The fact remains that GBC has not only failed to take account of neighbouring unmet need, it has actively and significantly;

- Reduced its Objectively Assessed Need (OAN) against the current of acute housing
- Reduced its proposed housing land supply despite historic and current under-performance of housing delivery, and;
- Discounted smaller housing sites which are well placed to meet the needs of neighbouring authorities and communities, despite weighting the reduced housing delivery to the back end of the Plan.

We strongly maintain that the settlement of Farncombe (with its shared boundary with GBC) represents a suitable, sustainable and accessible opportunity to help accommodate the unmet housing needs of both authorities in just the way that the duty to cooperate is designed to facilitate. Land South of New Pond Road (site No. 80) is ideally placed to assist Guildford Borough Council meet its housing land supply target whilst also helping to meet the acute needs of communities that share a border with Waverley borough in a geographic area which is well served by a range of existing services and amenities including a railway station which links Farncombe to Guildford (just 6 minutes travel time) and which is served by established bus routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Requested Modifications

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by allocating Site 80 for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (form 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. The Annual Housing Target Table contained in Policy S2 should be modified accordingly.

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as area F6 which was then further divided into F6A and FGB. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘...provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Requested Modifications

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by allocating Site 80 for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (form 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. The Annual Housing Target Table contained in Policy S2 should be modified accordingly.

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as area F6 which was then further divided into F6A and FGB. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘...provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.
Comment ID: pslp171/840  Respondent: 17308737 / Crimson Project Management Limited  Agent: (ROBINSON ESCOTT PLANNING LLP) John Escott

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Our clients object to Policy S2 and to the accompanying Table 1 on the grounds that the proposed spatial strategy and the proposed allocations in respect of the provision of housing and education facilities are inconsistent with the overarching strategic objective of delivering sustainable development and the presumption in favour of sustainable development that is set out at Policy S 1.

In particular, the draft plan is deficient in not allocating a sustainable urban extension to Fairlands for a mixed use development comprising a new educational facility, housing, community and other local facilities whilst allocating sites for such uses which are demonstrably less sustainable. Table 1 should be amended to include the sustainable extension to Fairlands as a village extension that will deliver up to 400 new homes within the next five years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/938  Respondent: 17318657 / Stephen Sage  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My comments are as follows:

1. SUMMARY It appears that Guildford’s proposal for more than 12000 new homes is excessive and based on flawed evidence. The proposal would lead to unnecessary loss of green belt, damage to Guildford’s character and further increases to the already high level of traffic congestion in our gap town.

2. POPULATION There is evidence that population growth has been greatly overestimated because students who leave have not been recorded.

3. QUALITY OF LIFE If the council does not control expansion the 2017 plan will harm the qualities that contribute to the economy of Guildford

4. LAND ALLOCATION So much land is allocated for development in the 2017 plan that Guildford may have to provide homes for Woking

5. CONGESTION The proposals in the plan will exacerbate the congestion problems that are already very bad.

I hope you will consider my comments and amend the plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.

The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.

Brownfield sites A4 and A34 have been removed from the Local Plan – meaning there is more pressure on Green Belt sites to meet the so-called housing "need".

On Affordable Homes, the previous version of the plan ( Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now it just says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developers don’t even have to do build any affordable homes, just make a tidy cash payment to the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Please see attached letter relating to PSLP Policy S2

[text of attachment reproduced below]

We do not set out in detail here every point of contention with the PSLP Housing Strategy nor do we necessarily object to other individual proposed submission allocated housing sites. Those detailed matters will follow in due course through the Examination.

The main thrust of our objections to Proposed Submission Policy S2 is threefold:

1. Housing Need has been reduced significantly from the July 2014 (Regulation 18) and June 2016 (Regulation 19) versions of the Draft Local Plan (Regulation 18) at the very time when housing need both regionally and nationally appears to be very substantially increasing. We find this approach perplexing and we question its credibility and desirability.

2. GBC’s Housing Land Supply and proposed housing allocations have altered dramatically from the July 2014 (Regulation 18) and the June 2016 (regulation 19) versions of the Draft Local Plan. Not only is there a significant reliance on major strategic housing allocations which will take many years to deliver housing, but the housing delivery rates are now weighted to the back end of the Plan period exacerbating still further the previous accrued under-delivery of housing in the borough; and

3. In light of the above, smaller and modest sized sites which are deliverable and which the Local Plan evidence base show can be delivered without causing significant harm, have been omitted from the emerging Local Plan at the very time when they could help GBC meet its (and neighbouring authorities) acute housing need.

The Borough Council openly acknowledges that it has accrued a very significant housing delivery shortfall moving into the Local Plan review process. In that regard, the Borough Council has approximately 3.2 years supply of housing land against the Government’s minimum requirement of 5 years housing land supply.

Despite the context of housing delivery under-performance, GBC proposes to reduce the Plan period by one year and its start date has been rolled forward by 2 years. In this respect, we are concerned that there is no credible explanation offered to indicate why the Plan period has been reduced in mid-Plan making process. This change to the Plan period has also been accompanied by a very significant reduction in the overall housing requirement during the Plan period from 13,860 to 12,426 dwellings (a reduction of 1,434 dwellings). This very sizeable reduction comes precisely at a point in time when housing need at the local and national level is so acute. Furthermore, the proposed change to the Plan period appears to be out of step with the Strategic Housing Market Assessment (SHMA) and the Housing Market Area (HMA) which relate to the period 2013 to 2033.

The West Surrey SHMA itself has been partially updated since the July 2014 Regulation 18 and June 2016 Regulation 19 versions of the Local Plan. We also note that the Guildford Addendum Report (2017) takes account of the latest population and household projections, the latest ‘post-Brexit’ economic projections, and the 2015 mid-year population estimate. It is highly notable that the Addendum Report has resulted in a reduced Objectively Assessed Need (‘OAN’) for Guildford borough from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). We struggle to understand how such a dramatic reduction in assessed housing need in Guildford borough bears any resemblance to the reality of the housing market in this part of the South East of England.

We consider that there are a number of in-principle matters for the examination to address in this regard.

Firstly; given the acute need for housing locally (and regionally) including record need and waiting times for affordable housing, together with significant unmet housing need in neighbouring Woking and Waverley boroughs, we question how such a dramatic reduction in the OAN is credible yet alone desirable? A further matter which we will seek to address at the examination is that Addendum Report appears to relate solely to Guildford borough rather than the wider strategic West Surrey SHMA area. The approach by GBC to calculating the revised OAN must brought in question especially in light of the duty to cooperate obligation.

Finally, on this particular matter, we question whether the approach taken by GBC to housing need and the PSLP’s approach to housing delivery through the Plan period is in accordance with the Government’s advice contained in the National Planning Policy Framework and the Planning Practice Guidance (‘PPG’).
The approach to Housing Land Supply through Proposed Site Allocations

GBC’s Housing Strategy is heavily reliant upon the delivery of several major draft housing allocation sites to bring forward a substantial proportion of new homes during the Plan period. GBC was also at pains throughout the PSLP committee debating process to assure elected Members, stakeholders, and local communities that the major housing allocations would only come forward when accompanied by necessary on and off-site infrastructure (including, but not limited to, new roads, utilities, and school provision). Consequently, GBC’s Housing Strategy in the PSLP (Regulation 19) is predicated on all necessary infrastructure required to facilitate the major housing site being delivered at the front end of housing scheme delivery.

The Housing Strategy has therefore been modified to illustrate that housing delivery on those major sites will be significantly delayed and as a result the PSLP housing strategy assumes a significant weighting of annualised housing delivery towards the back end of the Plan period.

We consider the proposed approach to the borough’s housing delivery will only serve exacerbate the acute need for housing (including affordable housing) in the borough which is already failing to perform against local targets and the Government’s 5 year housing land performance requirements.

Indeed, not only is the Borough Council moving towards an Examination with a sustained housing land supply shortfall when measured against its 5 year housing land supply target but the Council is also proposing a housing delivery strategy which will result in an additional accumulated shortfall of 1000 dwelling units up to 2026 against its own annualised OAN housing target (until the draft allocated major housing sites come on stream from 2026 onwards):

<table>
<thead>
<tr>
<th>Year</th>
<th>Unit Shortfall</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019/2020</td>
<td>200 unit shortfall</td>
</tr>
<tr>
<td>2020/2021</td>
<td>200 unit shortfall</td>
</tr>
<tr>
<td>2021/2022</td>
<td>150 unit shortfall</td>
</tr>
<tr>
<td>2022/2023</td>
<td>150 unit shortfall</td>
</tr>
<tr>
<td>2023/2024</td>
<td>150 unit shortfall</td>
</tr>
<tr>
<td>2024/2025</td>
<td>100 unit shortfall</td>
</tr>
<tr>
<td>2025/2026</td>
<td>50 unit shortfall</td>
</tr>
</tbody>
</table>

This annualised shortfall in housing delivery will be greater still if the Examination Inspector finds against GBC’s revised OAN methodology.

Despite this lamentable context, sites with potential to deliver housing in the first five years of the Plan period have been omitted from the emerging Local Plan despite being draft allocated from the 2014 draft Local Plan. For example, sites such as Pond Farm and Land South of New Pond Road (Site No. 80 (SHLAA site reference 2241) immediately adjacent to and contiguous with the built form and settlement boundary of Farncombe have been identified as part of the Borough Council’s housing evidence base and the Green Belt and Countryside Study as being suitable to deliver new housing.

In this context, the Promotion Site was draft allocated as part of site No. 80 (SHLAA site reference 1140 and part site reference 2241) in the Regulation 18 draft Local Plan: Strategy and Sites published for consultation in July 2014 as being suitable to deliver housing. The whole draft allocation site being 16 hectares of land to the south of New Pond Road (B3000) and intersected by Furze Lane. The wider site having been assessed by Pegasus Planning on behalf of the Borough Council as not contributing to the purposes of the Green Belt by virtue of its defensible boundaries and being well contained.

Site No. 80 was discounted from the Regulation 19 draft Local Plan (June 2016) absent of any fresh technical evidence to justify its omission.
The Promotion Site lies contiguous with the established form of Farncombe which itself lies in the adjoining borough of Waverley.

Waverley borough is also experiencing an acute need for new housing and its own Local Plan has been recently subject to Examination in July 2017 during which the Examination Inspector (Mr Jonathan Bore) has acknowledged that he is minded to recommend that Waverley Borough’s annualised housing target is increased significantly from 519 dwellings per annum to around 580 dwelling per annum (the precise amount is to be confirmed). The Waverley Borough Local Plan Inspectors also questioned Guildford Borough Council during the Examination on its ‘duty to cooperate’ role with Waverley Borough Council given the absence of any truly cross boundary strategic housing sites or apparent sharing of housing land supply. In this particular context, Farncombe is a sustainable settlement that benefits from a wide range of services and amenities including a railway station. Land at Pond Farm and Land South of New Pond Road is contained on its boundaries by physical built features including: New Pond Road (B3000) along the entirety of the northern boundary, the Portsmouth to London Waterloo mainline railway (to the eastern boundary) and established residential development (immediately south). The Promotion site itself is formed in two parcels intersected by Furze Lane which connects the village to the busy B3000. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the Promotion Site entrance.

The Promotion Site is set within the designated Surrey Hills AONB and the Green Belt which covers (washes over) all the land between Farncombe and Guildford. However, in respect of the AONB, two independent landscape appraisals have found that site No. 80 does not contribute to the characteristics and qualities of the wider Surrey Hills AONB and is impacted and influenced by the urban characteristics of the adjoining settlement. Furthermore, the Surrey Hill AONB office in its written comments to planning application reference WA/2014/1330 approved for 50 dwellings (immediately adjacent to the Promotion Site), acknowledged that the area south of the B3000 did not significantly contribute to the characteristic and qualities of the Surrey Hills AONB.

In respect of the Green Belt, it is highly notable that the Borough Council’s Green Belt and Countryside Study which is an important evidence based document also indicates that Site No. 80 does not perform strongly when measured against the purposes of including land within the Green Belt.

Nevertheless, the site promoters have commissioned further independent assessment of the site in terms of its visual impact on the landscape, its role as contributing to the purposes of the Green Belt and other technical matters including flooding and flood risk and we can confirm there is no impediment to delivering housing on the Promotion Site.

In term of the housing delivery and subject to the proper planning, design and layout of the Promotion Site we estimate the site can deliver between 90-100 dwellings including affordable housing at full policy rate, whilst still allowing for generous on-site open space and areas that will be kept free to allow for flood risk and established trees to be retained. The additional technical work commissioned by the Site Promoter effectively supports the earlier evidence base work undertaken by the Borough Council which led to the site’s draft allocation.

It is also evident that by allocating the promotion site, the Borough Council would be assisting housing need in Guildford Borough but also Waverley Borough which is a central objective of the duty placed on local authorities to cooperate in delivering housing land and meeting the need for housing at a more strategic level.

The promotion site is accessed via Furze Lane in an accessible location on the edge of a large sustainable village which has a wide range of services and facilities including a railway station which provides excellent links to Guildford (6 minutes) and onwards to London Waterloo. The settlement also offers local opportunities for employment and employment creation as part of a sustainable existing settlement. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the site entrance. In all these respects, Land South of New Pond Road is ideally placed to deliver a sustainable and deliverable residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The OAN should be increased to at least 693 dwellings per annum and Policy S2 modified accordingly.

The Annual Housing Target Table contained in Policy S2 should be modified accordingly and re-weighted to facilitate significantly more housing towards the front end of the Plan period.
As you will be aware through our Duty to Co-operate letter dated the 19th January 2017, Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special Protection Area (SPA) and the need to provide avoidance measures in respect of the impact of housing on the SPA. The Borough also has large areas of MOD operational land and Green Belt.

Surrey Heath is now in the early stages of developing a new Local Plan and continues to develop a broad range of appropriate evidence to enable it to make robust decisions in respect of the extent that the Plan is able to meet the OAHN for Surrey Heath. However, the Council’s most recent Strategic Land Availability Assessment (July 2016) indicates that there will be a shortfall of land within the Borough to deliver the Council’s OAHN and, whilst the Council will consider spatial strategies that could reduce this shortfall in the course of preparing the new Local Plan, it is unlikely that Surrey Heath will be in a position to meet the full OAHN for the Borough.

As a result, it is possible that Surrey Heath will need to look to its Housing Market Area to accommodate any demonstrated unmet need. In the event that the Housing Market Area is unable to meet this need, the Council may need to approach other authorities who do not form part of the Hart, Rushmoor and Surrey Heath housing market area, but with whom the Housing Market Area shares links. This would include Guildford.

In view of the above and in light of the fact that Guildford has previously proposed a sustainable development strategy capable of delivering 1,400 additional houses over and above that set out within the current iteration of its Proposed Submission Local Plan, Surrey Heath would welcome further engagement with Guildford under the Duty to Cooperate to better understand why Guildford, under the terms of the updated Plan, is unable to allow for any flexibility to accommodate any demonstrated unmet need arising in any neighbouring Boroughs. Surrey Heath would also request that the Guildford Duty to Cooperate Topic Paper is updated to include Surrey Heath as a duty to cooperate body with which
engagement on housing matters should be undertaken. This reflects the linkages between the Housing Market Areas covering Guildford and Surrey Heath and reflects the content of the Surrey Heath Duty to Cooperate Scoping Statement.

In response to the June 2016 consultation, Surrey Heath raised an objection to the proposed removal of Keogh and Pirbright Barracks from the Green Belt. The Council recognise that the Council’s concerns have subsequently been addressed by Guildford Borough Council, who have confirmed that the insetting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites as a result of their rural location and proximity to the Thames Basin Heaths Special Protection Area.

Surrey Heath Borough Council looks forward to continuing to working with Guildford in respect of housing and other Local Plan matters as each of the Authorities Local Plan progresses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1050  Respondent: 17327329 / Adrian Wise  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Council has singularly failed to state what it considers its objective need to be, issuing only a relative ‘net new dwelling’ number with no reference point which is therefore entirely meaningless. As this plan is not due to take effect until 2019/20 it cannot be the case that the same number of new dwellings will be required no matter how many there are now and no matter how many are built in the meantime – this would be nonsense!

Therefore the council’s proposed housing number is unsound and will be subject to a successful legal challenge.

According to the DFLG housing projections, based on ONS population and housing formation projections, extrapolated from the prior five years of data, the number of dwellings required in the Borough by April 2034 (i.e. the time period that the plan is to cover) is 65,859 – this was the starting point used by the council to inform its plan creation.

According to the last census, and adding completion and plan forecasts through 2019/20 when this plan is to come into effect, the total number of houses in the Borough by then will be at least 59,000. This leaves only less than 7,000 still to be built (from now until April 2034 i.e. 17 years i.e. about 411/year, far fewer than are being built now) – a number well within the five year land supply with no need to reclassify any green belt.

The council has put forward some arguments as to why it thinks a higher figure than 65,859 should be planned for. These are:

1. Higher student numbers – but student numbers are declining, foreign students are shunning Britain post Brexit (and we may well restrict them thereafter anyway) and there are no funds to expand the universities – the opposite is true. Even if student number growth were intended, which it is not, how anyway would a plan to build family homes far away from the university help this growth? This plan should go back into the melting pot.
2. Lower average house prices. It is claimed that somehow building a few more ‘market’ houses worth far more than the average house price will reduce the average. Simple maths shows the opposite would happen. To even claim an average price reduction because of over building houses worth more than the average is ‘fake news’. The most recent data for the South-East shows house prices anyway dropping rapidly toward the national average – the effects of Brexit (loss of confidence and exchange rate inflation squeezing real incomes), changes to stamp duty, ‘enveloped property tax’, etc. are cited as reasons why.
3. Contingency – why on earth ‘plan’ to exceed the plan, surely a plan is a plan.
4. After these three obviously wrong-headed adjustments the draft local plan then calls for 12,426 ‘net new homes’ (as stated with no reference point this target is meaningless – new added to what?). Using the councils’ own arithmetic however is ‘net new’ figure should be 9,810 not 12,426 – a glaring error.

I counter that Guildford should evidently be planning for far fewer than 65,859:

1. Net international migration, which the ONS says drove 80% of its most recent household formation projection, is way down post Brexit (this has led to a dramatic fall in net EU immigration, down 80% in the most recent quarter).
2. A five year view used by the council (via the DFLG projections) is the wrong ONS data to base its need assessment upon. The GLA for example bases its assessment on a 10 year view – which for Guildford would reduce its need below 60,000. As the GLA correctly points out using five years of data to extrapolate would mean undue emphasis would be given to the new EU entrant immigration ‘bubble’ of the late nineties. Hence they used a 10 year view in order to somewhat smooth out this bubble. All forecasters know it is important to eliminate outliers from their forecasts.
3. The Council has anyway not, as they are required to do, made any allowances for their ‘constraints’ such as the huge amount of green belt in their stewardship, lack of transport and other infrastructure, heritage assets, the flood plain within its area, air quality, AONB, TBHSPA, etc.

With all these matters considered the OAN for Guildford for 2033/34 would be well under 60000 and there would be no issue in achieving this. Indeed the crying need for the Borough is how to limit the over provision of market housing – and the local plan is silent on this crucial subject. Any homes to be built should be ‘affordable’, but note well that the NPPF definition of this term is dwellings owned by the council or its housing associations (etc.) and/or with rents at least 20% subsidised by the council. There is no funding for either of these categories. [NB it is incredibly insulting to call market houses that will sell for many £100,000 ‘affordable’ as the council does in its draft plan – these are just slightly cheaper market houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. This figure has changed from ‘over 2,800’ to approximately 3,000.

To support the Government’s housing agenda, there needs to be a recognition in the Council’s vision that the scale of housing in urban areas should not be artificially capped, given the sustainability advantages of located new houses in urban areas. Therefore, on this basis, we suggest that the terminology is amended to revert to the sentiment that ‘at least’ 3,000 homes will be located in urban areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The terminology should be revised to consistently refer to ‘at least’ when considering the distribution of homes as well as the total requirement.

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1070</th>
<th>Respondent: 17328705 / Aviva Investors (Helen Rainsford)</th>
<th>Agent: Q+A Planning Ltd (Peter Keenan)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

Policy S2 includes amended housing need to at least 12,426 dwellings by 2034, together with an amended office and industrial requirement. It also now includes the requirement for 41,000 sqm of comparison retail floorspace. In respect of the retail figure, it should be noted that this relates to the need to 2030 rather than 2034, and in addition for clarify it should be confirmed whether this is a gross or net figure.

It is noted that the details of the allocated sites have been removed from paragraph 4.11, due to duplication with the allocations section of the plan. There is a new sentence that states ‘Further details of the sites that are considered to be key to delivering the strategy are provided in the site allocations policy of the Local Plan and shown on the Policies Map’. Whilst we have no objection to the sentiment of this strategic policy, nor the detail of the supporting paragraph, the supporting text ought to make clear that there is nothing precluding appropriately located alternative and additional sites – particularly in Guildford town centre - coming forward during the plan period to meet housing needs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The retail need figure should be clarified as to whether it is net or gross
There ought to be an additional paragraph that makes it clear the policy does not preclude other appropriately located housing sites coming forward during the plan period to meet housing needs

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3479</th>
<th>Respondent: 17328705 / Aviva Investors (Helen Rainsford)</th>
<th>Agent: Q+A Planning Ltd (Peter Keenan)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

In the sites section of the Plan, 11 sites are allocated with Site A4 at the Telephone Exchange deleted. Of these sites, seven include housing. The total gross number of housing units for these sites over the plan period is 1,285, representing an increase from 1,135 from the previous version of the plan, representing an uplift of 150. It is noted that the allocation for the North Street site has increased 100% from 200 to 400.

Over half of the units allocated for the town centre (750) are expected to come forward on two large sites; namely North Street and at the Station. The proposals at North Street have been in the pipeline for approximately 15 years, with numerous false starts. It is appreciated that the Council have an exclusivity arrangement with the owners of the Friary Centre to attempt to agree commercial terms. However, as far as we are aware, these discussions have not yet concluded. Therefore, the timetable of this scheme remains uncertain.

In respect of the Station, planning application for a mix of uses to include 438 dwellings has been refused by the Council and is due to be heard at an appeal in November 2017. Therefore, there is some doubt over the timescales and the scale of housing that can be delivered on this site.

The Council is faced with a substantial need – both retail and residential – that the NPPF explains in paragraph 23 should be met in full and that local planning authorities should allocate a range of suitable sites. Therefore, we consider there is justification from the evidence before the Council to include a further allocated site to help meet these needs and provide choice to the market, consistent with the NPPF.

Therefore, Aviva Investors wish to put forward White Lion Walk shopping centre as a proposed allocation in the Plan for a mix of retail, leisure and residential uses. Aviva have only recently acquired the asset and therefore were not able to put forward the site for development in previous consultations or call for sites exercises. However, given that the Council have sought to increase the total number of dwellings in the town centre compared to the previous version of the Plan, and given the uncertainty surrounding the main two residential sites in the town centre, we consider there is robust justification to include White Lion Walk shopping centre as an allocation for retail (recognising it is already in retail use), residential and potentially leisure (in the food and beverage sector).

Whilst the shopping centre is occupied, the existing configuration is not fit for purpose when considering retailer requirements and macro-economic trends in the retail sector. Therefore, at this stage, our client is considering feasibility of different options for the site. However, the eventual outcome it is likely to include a reconfiguration of the existing retail floorspace to provide new floorplates meeting market demand, potentially with some supporting food and beverage uses and residential space on upper floors. The scheme has the potential to deliver up to 100 dwellings on the upper floors, subject to feasibility testing and design considerations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

While Lion Walk shopping centre should be allocated for a mix use development opportunity

**Attended documents:**

---

**Comment ID:** pslp171/1927  
**Respondent:** 17340193 / Surya Hotels (S Dulai)  
**Agent:** Stuart Willsher

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Policy S2 relates to the Council’s Spatial Development Strategy. It is noted that the wording of this policy has been amended to provide greater clarity regarding the overall housing requirement, as a total of 12,426 new homes during the plan period 2015-34.

The policy confirms that proposed allocations are shown on the corresponding proposals maps. As referenced above, the proposals map now proposes the removal of the Thatcher’s Hotel site (in contrast to the East Horsley Neighbourhood Plan). Given the ongoing viability concerns surrounding the hotel, it is considered that the site could make a contribution to the Council’s housing supply, as and when evidence is provided to support its redevelopment, and as such it is considered that its allocation could be retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3510  Respondent: 17340577 / William Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The changes to the plan have created even more contradictions to what it hopes to achieve and what it proposes. It says that it proposes to reduce the need to travel and energy consumption and then increases the number of sites in policy A29 and the number of homes allocated to 1750+ in an area where there is insufficient wealth creation at the very edge of the borough to employ the existing population let alone these proposed new residents, thereby creating even more commuter journeys. Ash and Tongham is being considered as a town when by definition they are not since a town is a place where people not only live but also work which is patently, not the case. Ash, Tongham, Ash Vale and Ash Green should still be afforded their individual identities and would have had, if the green buffer area which is now so important between Ash, Tongham and Aldershot, had been applied to them in the recent past. The green,Tranquil buffer (4.3.34) actually sits aside 4 lanes of fast moving traffic (except at peak times when the traffic is anything but).

The increase in the number of sites in policy A29 added to A28 means an increase of new homes in excess of 1800 new homes, all on green field sites in villages already known to be the second largest urban conurbation in Guildford borough. This increase is only surpassed by the proposed Wisley allocation of 2000. It does appear that other villages within the borough are not having to give up so much of their pleasant environment as Ash, Tongham and surrounds have done in the past and now again in this ammended plan, not that I have any wish to see this "chase for growth and push the debt on the next generation" attitude inflicted on anybody else.

The site allocation of policy A29 now includes areas of Ash Green to the north, south and east of Ash Green road and South of Foreman Road which the plan purports to protect without any consideration for a green buffer apparently so important elsewhere.

The amended plan purports to protect sites of historic interest yet policy A29 is in direct conflict with this given its impact on Ash Manor.

The admission that the local infrastructure doesn't meet the needs of many of its residents and is considered poor by many (para 4.6.1) will not be addressed by infrastructure improvements for only those in these new developments (policy Id1). Thereby diminishing further the living standards of the existing residents due to the blight of new development as admitted in policy Id1.

The site apportioned in policy A29 for the new road bridge to relieve congestion caused by the Ash station level crossing has been deleted and is not identified elsewhere which suggests no priority for such an important infrastructure necessity now, regardless of future development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1156  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)
Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

The Spatial Vision (following paragraph 3.1) and Local Plan Policies S2 and P2, as amended, are not sound.

The Spatial Vision, as amended, does not include a sufficient number and variety of housing allocations to meet the identified growth needs of the Borough. The reliance on a limited number of strategic greenfield sites with substantial infrastructure requirements results in shortages of housing land supply in the early years of the plan and uncertainties about housing delivery in the later years of the plan. In particular, the Council has not included sufficient land in sustainable locations on the edges of the urban areas, in locations that would entail modifications to the inner boundaries of the Green Belt, such as Tangley Place Farm, Worplesdon.

The proposed phasing of housing supply in Policy S2 (spatial development strategy and annual housing targets), as amended, is not justified and does not meet the objectively-assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are also doubts about whether housing targets will be met later, because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the reliance of the spatial development strategy on specific infrastructure improvements.

Policy P2 and the related maps of Green Belt boundaries, as amended, are not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of arbitrary land parcels.

The review of Green Belt in the area of Tangley Place Farm, Worplesdon, exemplifies these shortcomings which are explained in detail in the Tangley Place Concept Statement that forms part of this submission. In this area, Green Belt boundaries should be reviewed, as described in the report, to accommodate a mix of housing and open space uses (including SANG and other open space uses) within revised Green Belt boundaries that reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above and the attached report by Sustainable Land Products (Tangley Place Concept Statement) for further details.

Attached documents: BRS.5853_12_C_Design_Vision_230617.compressed (1).pdf (15.3 MB)

---

Comment ID: pslp171/1177  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)
Refer to the attached report for evidence why the proposed housing target set out in Policy S2 fails to address Woking Borough Council's unmet housing needs and cannot therefore be regarded as being sound.

[Text of attachment reproduced below]

3.1 The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).

3.2 In respect of delivering a wide choice of high quality homes, the NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that LPAs should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).

3.3 Paragraph 47 also requires Local Planning Authorities (LPAs) to:

- Use their Evidence Base to ensure that their Local Plan meets the full, Objectively Assessed Needs (OAN) for market and affordable housing in the Housing Market Area (HMA), as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

- Identify and update annually a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, LPA’s should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a 5-year supply of housing land to meet their housing target; and;

- Set out their own approach to housing density to reflect local circumstances.

3.4 With regard to plan-making, LPAs are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156). Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of, and strategies for, housing and employment uses, taking full account of relevant market and economic data (paragraph 158).

3.5 For plan-making purposes, local planning authorities are required to have a clear understanding of housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period (paragraph 159).

3.6 The Local Plan will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. LPA should submit a plan for examination which it considers is “sound” – one that it is positively prepared – and the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure
requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development (paragraph 182).

**Overall housing strategy**

3.7 Guildford forms part of the West Surrey HMA, which is made up of three authorities, namely the administrative areas of Guildford, Waverley and Woking Borough Council’s. In keeping with the Duty to Cooperate (Para 178, NPPF), Woking Borough Council (WOK), Waverley Borough Council (WAV) and Guildford Borough Council (GBC), signed the West Surrey Memorandum of Understanding (MoU). The MoU confirms that the geographical area of the three boroughs forms a common HMA for this part of Surrey and sets out a framework for partnership (underpinned by a Statement of Common Ground) to carry out a SHMA for the West Surrey HMA.

3.8 To support economic growth and tackle the acute under supply of housing and affordability issues that affect Guildford, the West Surrey SHMA: Guildford Addendum Report (March 2017) identifies that GBC has an Objectively Assessed Housing Need (OAHN) of 645 dwellings per annum (dpa).

3.9 Paragraphs 4.1.5 to 4.1.11 of the GBLP set out GBC’s spatial development strategy, identifying the scale and distribution of development. With reference to the OAHN contained in the West Surrey SHMA, these paragraphs support Policy S2, GBC’s Borough Wide Strategy, which identifies overall minimum housing requirement of 12,426 dwellings to be built across the borough between 2015 and 2034. Having accepted the need to meet OAHN in full, the annualised housing target (645 dpa) contained in the GBLP matches annualised OAHN target outlined in the West Surrey SHMA.

3.10 Zurich appreciates that GBC have endeavoured to produce a plan that is ‘positively prepared’ in accordance with paragraph 182 of the NPPF and ‘boost significantly’ its supply of housing (paragraph 47, NPPF) by uplifting the borough’s overall housing target, compared to earlier iterations of the plan. However, concerns are nevertheless raised whether the OAHN figure outlined in the SHMA and subsequent housing target can truly be considered to represent full OAHN. Zurich consider it vitally important to bring forward new housing quickly and meet OAHN in full throughout the plan period. To this end, Zurich encourages GBC to recognise the positive contribution Broadford Business Park can make towards meeting these annual housing targets. Zurich’s concerns are explored below.

**Objectively assessed housing need and unmet housing need**

3.11 In accordance with the NPPF, the three authorities that makes up the West Surrey HMA have agreed to collectively assess their OAHN as a single HMA that is then broken down into the constituent authorities’ areas. Critically, the MoU acknowledges the shared responsibility of all three authorities to meet the full OAHN of the West Surrey HMA.

3.12 Of the three authorities, WOK is the only one with an adopted Core Strategy. The Core Strategy was adopted on October 2012, albeit with a requirement for an ‘early review’ of the plan (although this it is noted that this has not taken place), and has a plan period up to 2027. It has an adopted housing requirement of 292 dpa, against its objectively assessed housing need of 517 dpa (or 10,340 dwellings for the period 2013-33).

3.13 Using the net housing delivery figures contained within WOK’s 2015/16 AMR, the forecast delivery for the 2016-21 period contained within WOK’s Five Year Housing Land Supply Position Statement 2016, and, the 292 dpa housing target contained within WOK’s Core Strategy for the period 2021-27, it is possible to forecast WOK’s housing delivery for the adopted plan period up to 2027. The calculation shows that for this period, WOK will deliver 5,078 dwellings. This is 5,262 dwellings less than WOK’s OAHN as identified by the 2015 version of the West Surrey SHMA.

3.14 WOK is currently preparing a new Site Allocations DPD, however, WOK’s Hearing Statement[4] to Examination in Public (EiP) of WAV’s New Local Plan that:

> ‘The Site Allocations DPD has been identified with the purpose of identifying deliverable sites to enable the sustainable delivery of the development requirements of the Core Strategy. [and] …it is not intended to identify sites to meet unmet need within the Housing Market Area.’

3.15 Thus, WOK do not intend to meet the unmet housing need within its administrative boundary. Instead, WOK refer to the agreed Statement of Common Ground and the abovementioned MoU which set out how WOK, WAV and GBC will work together to:

‘address any residual unmet need within the [West Surrey] Housing Market Area after their Local Plans are adopted’[5].

3.16 Question 2.1 contained within the ‘Matters and Issues for Examination’ prepared by Inspector Jonathan Bore for the Examination in Public (EiP) of WAV’s New Local Plan[6] queries how WAV intends to meet WOK’s unmet housing need. Zurich believes that Inspector Bore’s concerns to be equally valid to GBC on the basis the three authorities form part of the same HMA.

3.17 Physically, WOK is almost 1/4 of the land area of GBC. In meeting Core Strategy 2012 housing target of 292 dpa, WOK has sought higher density developments on existing brownfield sites, which are now increasingly in short supply.

3.18 Considering the unmet need arising from WOK’s current OAHN figure of 517 dpa against its land availability pressures, it is essential that WAV and GBC follow a coordinated approach in ensuring the shortfall in meeting the full OAHN in the West Surrey HMA is addressed. Without this, GBC, WOK and WAV will be unable to satisfy paragraph 47 of the NPPF, thereby rendering the GBLP unsound.

3.19 At the EiP of WAV’s New Local Plan (July 2017), Inspector Bore made clear that WAV is obligated to meet at least half of WOK’s unmet housing need. Consistent with the view of Inspector Bore, Zurich considers GBC and WAV should explore taking responsibility for the unmet need on a 50:50 basis (i.e. 2,631 dwellings each). This would require GBC to increase its housing target from 12,426 dwellings to 15,507 dwellings, or an additional 175 dpa across the plan period 2019-34.

3.20 It should also be noted that GBC has an affordability ratio amongst the worst in the country, at over 10. The ratio is similar to that recently considered in the examination of the Mid Sussex Local Plan. Zurich therefore highlights and agrees with the Inspector’s conclusions at Mid Sussex[7], recommends increasing the OAHN and associated housing target to improve affordability in the borough.

Examination REP-11681921-1, p.3 http://www.waverley.gov.uk/downloads/file/5672/rep-11681921-1_woking_bc_hearing_statementpdf

[5] ibid

3.21 As currently drafted, the GBLP does not meet any of WOK’s unmet need and so means the plan cannot be deemed to have been ‘positively prepared’, ‘effective’ or ‘consistent with national policy’, as required by paragraph 182 of the NPPF.

3.22 As highlighted by the allocation of sites such as Broadford Business Park as part of the previous iteration of the GBLP (June 2016), it is clear that suitably identified land exists within GBC to support residential development and assist in accommodating WOK’s unmet housing need and improve the availability and affordability of housing in the borough.

**Exceptional circumstances**

3.23 To achieve GBLP’s objective of meeting OAHN in full, GBC have accepted that ‘exceptional circumstances’, as referred to in paragraph 83 of the NPPF, exist to allocate sites in the Green Belt for development. The relationship between meeting OAN and Green Belt constraints is well tested in case law[8].

3.24 As endorsed in these High Court Judgments, plan-making is a two stage approach (NPPF, para 47), in that an objective assessment of housing need is first required, and then a distinct assessment as to whether (and, if so, to what
extent) other policies dictate or justify constraint, such as Green Belt designation. There is no evidence available to
demonstrate that GBC has come to the conclusion that 654 dpa represents the “upper limit” of “exceptional
circumstances” or that there borough is subject to unreasonable constraint. It should be noted that the Inspector
responsible for the EiP into Waverley’s Local Plan found that the additional impact on traffic and highway capacity
arising from accommodating WOK unmet supply housing was insufficient grounds to avoid meeting OAHN in full.

3.25 Accordingly, it is considered that “exceptional circumstances” exist to release additional Green Belt sites beyond
those currently included within the GBLP, in order to seek to meet full OAN.

3.26 Policy S2 states the annualised housing target will gradually increase from 450 dpa in 2019/20 to 850 dpa in 2033/
34. As currently proposed, the housing trajectory for 2019-34 does not provide a reasonable estimate of delivery over the
plan period, with an overreliance on the redevelopment of the former Wisley Airfield as a source of housing supply. The
proposed development at Wisley represents over a sixth of the total new homes planned for GBC.

3.27 The housing trajectory needs to be considered in the context of the planning appeal[9] (to be heard in September
2017), against GBC’s decision to refuse planning permission for the redevelopment of this site. Assuming the Inspector
upholds GBC’s decision to refuse planning permission, this will delay the delivery of housing.

3.28 Large sites such as the former Wisley Airfield take time to progress through the planning process, with complexities
in infrastructure delivery and phasing further increasing the time required to delivery new housing. As such, any benefits
from these sites are not likely to be felt until much later, and potentially beyond, the identified plan period.

3.29 The overreliance of major developed sites as part of a housing strategy has been previously considered in the
Inspector’s Report into the Runnymede Local Plan, which was found unsound in 2014[10].

3.30 The housing trajectory, at present, does not comply with the requirement of paragraph 21 of the NPPF that:

‘policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response
to changes in economic circumstances.’

3.31 The allocation of sites such as Broadford Business Park, which have previously been allocated for residential
development and can be developed earlier in the plan period, will help to diversify the spatial strategy and sources of
housing supply in the borough, thereby enabling the chronic under supply of housing in the borough to be addressed
more quickly.

Five year housing land supply and backlog need

3.32 The Land Availability Assessment Addendum (LAA2) (2017) identifies the following record of completions against
the housing requirement during the period 2015-17:

- 2015/16 – 381 net completions (-273 deficit)
- 2016/17 – 297 net completion (-357 deficit)

[9] Appeal ref: APP/Y3615/W/16/3159894
3.33 Based on the above:

- GBC has a cumulative under delivery of 630 dwellings to date against its identified OAHN;
- This is likely to increase as a result of further under delivery in the latest reporting year (2016/17); and
- GBC has failed to meet its OAHN for the past four years.

3.34 GBC has therefore persistently under delivered against its housing targets and a 20% buffer should be applied to its housing requirement.

3.35 The LAA2 recognises this and notes the requirement for the 2017-22 period is 4,681 dwellings (inc. 20% buffer). However, GBC has only identified land for a total of 2,210 dwellings that are capable over being delivered within the first five years of the plan. This total includes sites with planning permission, sites without planning permissions and the windfall allowance.

3.36 Notwithstanding potential concerns in relation the deliverability of the sites included within GBC’s identified supply, the LAA2 concedes that GBC is currently only able to demonstrate a 2.36 years’ supply of housing. Paragraph 49 of the NPPF states that:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”.

3.37 GBC has sought to phase the delivery of housing across the plan period. However, during the first five years of the plan period (2019/2020 – 2023/2024) the GBLP targets that between 450 and 500 new homes will be built across the borough. This falls significantly short of the 645 dpa identified in the West Surrey SHMA as needing to be delivered to meet GBC’s identified need (not accounting for WOK’s unmet need, as discussed above). Such an approach is inconsistent with the need to ‘boost significantly’ the supply of housing, as set out in paragraph 47 of the NPPF, make up the current backlog of housing delivery and ensure that GBC can demonstrate a robust five year housing land supply earlier in the plan period.

3.38 However, when taking into consideration GBC’s identified OAHN, housing delivery performance to date, and forecast delivery, it is unlikely that GBC will be able to demonstrate a five year housing land supply for the entire duration of the GBLP.

Summary and conclusion

3.39 Zurich considers that the failure to meet WOK’s unmet housing need and the lack of deliverable sites being identified early in the plan period to quickly address the severe housing shortages in the borough, means that Policy S2 cannot be considered as being ‘positively prepared’, ‘effective’ or ‘consistent with national policy’, as required by paragraph 182 of the NPPF. Accordingly, Zurich consider the policy as it stands to be unsound.

3.40 To resolve this, Zurich considers GBC should identify additional sites that can contribute towards meeting the borough housing needs at an earlier stage of the plan period. As discussed later in these representations, Broadford Business Park is deliverable and offers an opportunity to assist GBC in meeting this shortfall in supply. In addition, a further review of the allocations made as part of LAA1 could also be undertaken, to identify ‘suitable’ and ‘available’ sites, that could be delivered in the short term and contribute towards GBC’s 5YHLS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Refer to the attached report for advice regarding the need to increase the housing target in the Proposed Submission Local Plan to meet the true OAHN i.e. meeting any unmet housing need, for the borough in full.
We have concerns regarding the proposed Policy S2: Borough Wide Strategy for the plan period, as the reduction in housing provision has not been properly justified and the council has failed to consider the needs of neighbouring authorities.

Since the publication of the Pre-Submission Local Plan in June 2016, Guildford Borough Council (GBC) has reduced the overall housing target for the plan period from 13,860 to 12,426, this policy also includes an amendment to the plan period from 2013 - 2033 to 2015 - 2034. GBC has sought to justify this by citing an adjustment in OAN resultant of changes in projected economic forecasts within the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 ('2017 SHMA).

Affordability & Market Signals

The council suggests that economic circumstances point to a reduced need for housing, however affordability issues and the demographic baseline detailed in the 2017 SHMA point towards a difference conclusion. The baseline figure alone in the 2017 SHMA shows an increase in housing need in the borough from 517 dpa to 552 dpa. This clearly demonstrates significant growth in housing need from 2015-2017.

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of those is the need to take into account market signals, such as land prices and housing affordability. Whilst Paragraph 19 of the NPPF stipulates that housing need numbers should be adjusted to reflect appropriate market signals.

Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers).

The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

The councils evidence base clearly demonstrates affordability issues within the borough, and whilst it is concluded within the 2017 SHMA that an uplift should be applied, this is insufficient at present to contribute towards improving affordability within the borough and the wider HMA.
In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

**Duty to Cooperate & Unmet need**

The NPPF duty to cooperate requires LPAs to demonstrate evidence of having effectively cooperated to plan for cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area. Providing a requirement for Local Plans to seek to deliver ‘the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’.

The Council’s evidence base fails to assess the potential for meeting unmet needs arising from outside the Borough. The Council only seeks to provide housing for its own assessed need.

Guildford falls within the West Surrey Housing Market Area (HMA) which comprises of 3 Local Authorities: Woking, Waverley and Guildford Borough Councils. Importantly, the current Waverley Local Plan examination has raised key issues in regard to Woking’s unmet need, and the need for clarity on how this is to be addressed through the wider HMA. It was determined at the Waverley examination hearings that they would be expected to meet half of the unmet need arising from Woking, amounting to 83dpa.

Given that paragraph 4.1.9a of the Proposed Submission Local Plan states that the housing requirement ‘is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period’. We consider that Guildford has sufficient capacity to ensure that they can make a significant contribution to the remaining unmet need of Woking, in addition to their own OAN and consequently this should be reflected in their housing requirement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/3511  **Respondent:** 17345441 / Thakeham Homes (Sarah Sutcliffe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Guildford Borough Proposed Submission Local Plan (Regulation 19) – Representation**

Re: Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

**Introduction**

These representations are submitted in respect of Thakeham’s interest on land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford (‘the site’). The site is also known by LAA reference 1264, and has previously been promoted to the Local Plan, including to the Draft Local plan consultation in autumn 2014 and Pre-Submission Local Plan consultation in June-July 2016.

We wish to support the proposed insetting of Shalford within the Green Belt in the Proposed Submission Local Plan, however as per our representations submitted in July 2016 we wish to object to the proposed designation of this site as ‘Open Space’ and the findings contained within the Amenity Assessment, which in our view does not provide sufficient justification for this allocation.

Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford
Thakeham Homes wishes to recommend the site for residential development and as such supports the indicated changes to inset Shalford into the Green Belt in the Proposed Submission Local Plan. The red line location plan for the site has been appended to this representation at Appendix 1.

[Figure 1]

Deliverability

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. In summary, we consider that this site has limited amenity value and object to the proposed designation of the site as open space. The site is deliverable for residential development, and could be delivered within the first five years of the plan period.

Conclusions

In conclusion, we consider that the reduction in OAN and consequently intended housing provision is unsound, and the Council has not provided the required justification for this reduction. In particular, the intention of Guildford Borough to not contribute to the unmet needs in the HMA is of particular concern, and we would suggest that GBC seek to accommodate the 83dpa shortfall to ensure the housing needs of the HMA are met.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

As detailed above, we have actively promoted this site for residential development and are pleased that the Council has sought to inset the settlement from the Green Belt. We do however have concerns regarding the Councils application of both AGLV policy across the settlement and Open Space policy on the site. We do not consider that the site has been assessed correctly within the ‘Assessment of Site for Amenity Value 2017’ document, and recommend that the land to the rear of Greenhill and Burnside, Shalford, is removed from Policy ID4 as open space due to its limited amenity value and private ownership.

We have also demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2017_07_18_GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside__Appendix_1.pdf (382 KB) 2017_07_18__GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside_Chinthurst_Lane_Shalford.pdf (854 KB) 2017_07_20_GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside__Appendix_2.pdf (411 KB)
Policy S2: Borough Wide Strategy ‘Housing Provision’

One of the more significant changes presented in the Proposed Submission version of the Local Plan is the reduction in the Objectively Assessed Need for Housing (OAN) presented as part of the emerging Policy S2. We object to these changes as the reduction in housing provision has not properly justified and the Council has failed to consider the unmet need for neighbouring authorities.

Since the publication of the Pre-Submission Local Plan in June 2016, Guildford Borough Council (GBC) has reduced the overall housing target for the plan period from 13,860 to 12,426, this policy also includes an amendment to the plan period from 2013 - 2033 to 2015 - 2034. GBC has sought to justify this reduction by citing an adjustment in OAN resultant of changes in projected economic forecasts within the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (2017 SHMA).

Affordability & Market Signals

The Council suggests that economic circumstances point to a reduced need for housing, however affordability issues and the demographic baseline detailed in the 2017 SHMA point towards a difference conclusion. The baseline figure alone in the 2017 SHMA shows an increase in housing need in the borough from 517 dpa to 552 dpa. This clearly demonstrates growth in housing need from 2015-2017.

Our view is that the 2017 SHMA does not properly reflect the affordability constraints in the Borough and fails to apply a sufficient uplift. The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of those is the need to take into account market signals, such as land prices and housing affordability. Whilst Paragraph 19 of the NPPF stipulates that housing need numbers should be adjusted to reflect appropriate market signals.

Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers). The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

The Council’s evidence base clearly demonstrates affordability issues within the Borough, and whilst it is concluded within the 2017 SHMA that an uplift should be applied, this is insufficient at present to contribute towards improving affordability within the Borough and the wider HMA.

In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

Duty to Cooperate & Unmet need

The NPPF duty to cooperate requires LPAs to demonstrate evidence of having effectively cooperated to plan for cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area. Providing a requirement for Local Plans to seek to deliver ‘the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’.
The Council’s evidence base fails to assess the potential for meeting unmet needs arising from outside the Borough. The Council only seeks to provide housing for its own assessed need.

Guildford falls within the West Surrey Housing Market Area (HMA) which comprises of 3 Local Authorities: Woking, Waverley and Guildford Borough Councils. Importantly, the current Waverley Local Plan examination has raised key issues in regard to Woking’s unmet need, and the need for clarity on how this is to be addressed through the wider HMA. It was determined at the Waverley examination hearings that they would be expected to meet half of the unmet need arising from Woking, amounting to 83dpa.

Given that paragraph 4.1.9a of the Proposed Submission Local Plan states that the housing requirement ‘is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period’. We consider that Guildford has sufficient capacity to ensure that they can make a significant contribution to the remaining unmet need of Woking, in addition to their own OAN and consequently this should be reflected in their housing requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Reference should also be made to the HBF representation which, as members, we fully support.

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;

This figure was then adjusted to include:

- Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;

- Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;

The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international
negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the borough and that these should revert to the 2015 West Surrey SHMA figures.

**Duty to Cooperate**

It is also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough.

**Five year Supply of Housing Land**

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan should be declared unsound.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s 'Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034. The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to the level set out in the 2016 draft Plan;
ii) Greater flexibility should be given to the redevelopment potential of existing, sustainable, previously developed sites which could bring forward additional housing, making the most effective use of available sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 sets out the council's approach to meeting its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47).

The Proposed Submission Local Plan has pushed the plan period back from 2013-2033 to 2015-2034. Given the Borough's significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2033 than is required or was previously planned for.

The phasing of development in the Proposed Submission Local Plan 'backloads' the housing target. The overall housing target is equivalent to 654 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2026/27. It is already generating a significant backlog of housing need with only 388 homes delivered in the last full year for which data is available (2015/16).

The proposed approach does not plan to meet OAN in any reasonable timescale, will add to the Council's backlog, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

The Council will also be aware that from November 2017, authorities that deliver below 85% of the borough's OAN will be expected to plan for an addition 20% buffer on their 5 year plan.

Delivery of below 65% from November 2020 the presumption in favour of sustainable development in the National Planning Policy Framework would automatically apply (Housing White Paper 2017).

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

Sufficient, deliverable sites need to be identified to meet this increasing need for housing land, particularly in the east of the Borough, where capacity has been released due to the grant of permission for SANG land at Long Reach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1214  Respondent: 17380865 / Crownhall Estates (Sir or madam)  Agent:  Turley (David Murray Cox)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

POLICY S2 PLANNING FOR THE BOROUGH – OUR SPATIAL DEVELOPMENT STRATEGY

These representations raise the following concerns with regards to Policy S2:
• The identified housing needs of Guildford Borough;
• The provision of housing for the unmet needs of neighbouring authorities;
• The phasing of development as set out in the Annual Housing Target table;

The identified housing needs of Guildford Borough
The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part 1 Inspector has applied an uplift of 25%.

The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

The provision of housing for the unmet needs of neighbouring authorities

At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities within the same Housing Market Area (for example Waverley and Woking Boroughs).

We understand that Woking Borough is continuing to plan on the basis of its Core Strategy requirement (292 dwellings per annum to 2027, in comparison to the OAN identified in the West Surrey SHMA 2015 of 517 dwellings per annum between 2013 - 2033) (therefore 225 dwellings fewer). The Waverley Local Plan Part 1 was originally prepared on the basis of meeting an OAN of 519 dwellings per annum; the Inspector’s consideration during the Examination has revealed that provision should be made for an OAN of at least 590 dwellings per annum. Furthermore, we understand the Waverley Local Plan Part 1 Inspector has concluded that provision should be made for a proportion of Woking’s unmet need within Waverley and Guildford Boroughs and that the Inspector settled on a figure of 83 dwellings per annum as being equivalent to half of Woking’s unmet need.

It is essential that consideration is given to how the unmet needs of Woking are to be provided for. A failure to make provision for this level of housing development would result in a shortfall of 225 dwellings per annum.
In addition, we consider that the Guildford Borough Local Plan should be prepared on the basis helping to provide for other authorities should the need arise. The Council’s proposal to designate a large part of the Borough as Green Belt further restricts the ability to cater for unmet housing needs arising from within the HMA.

The phasing of development as set out in the Annual Housing Target table

We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2026/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequentially this raises concerns over whether any accrued shortfalls can be resolved.

If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates. Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

We do not consider that paragraphs 4.1.9a and 4.1.9b of the Housing Topic Paper justifies the Council’s phased approach to the delivery of housing during the Plan period. This is particularly the case because the assessment of sites has been constrained by the Council’s intention to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt. This represents an artificial view of land availability in the Borough and predetermines conclusions as to the ability of the housing requirement to be met. We consider that if the Council had not adopted such a stance then it likely that additional opportunities would have been identified for housing development, including within the early part of the Plan period when the Council perceives there to be difficulties in delivering sufficient housing to meet the OAN.

The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider
Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

We note that paragraph 4.1.9a of the Proposed Submission Local Plan states:
“This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a. The proposal to allocate additional land as Green Belt results in a situation whereby the presumption in favour of sustainable development is unlikely to apply to much of the Borough (by virtue of paragraph 4.1.4 of the Proposed Submission Local Plan and footnote 9 of the NPPF).

Within the Land Availability Assessment (2016), the Land north of Poyle Road, Tongham is identified as under the heading ‘Discounted Sites’ (under the reference 79), due to ‘suitability concerns regarding the proposal to designate the land as Green Belt as part of the new Local Plan development’. The Land Availability Assessment (2016) does not identify any other reasons why the site is unsuitable for development. It is unclear why the site has not been assessed for its suitability for housing development despite it not being designated as Green Belt at present. As these representations demonstrate, that approach results in an artificially constrained view of land availability and predetermines the position as to the availability of potential sites for housing delivery within the Borough.

There are various considerations that need to be addressed in regards to the Proposed Submission Local Plan and the level of unmet housing need, in particular the Council’s inability to demonstrate a five year housing supply and the strategy for delivering housing within the Proposed Submission Local Plan. In particular, with the five year supply shortage and an expected shortfall of sites within the early years of the Local Plan, the Council’s housing supply position can only be expected to worsen. Furthermore the Council’s reliance on strategic sites, in the latter half of the plan period could lead to longer term shortfalls or delays in housing supply if those sites fail to deliver at the rate expected. The housing supply shortfall and the Council’s reliance on large sites (delivering at the end of the Plan period) reinforces our view that the Council should seek to utilise a greater range of sites and in particular should not look to restrict development by designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt.

SUMMARY AND CONCLUSIONS

These representations set out key concerns regarding the Proposed Submission Local Plan. These key concerns relate to the delivery of housing to meet needs within Guildford Borough (and unmet needs from other authorities) during the plan period, the proposed phasing of development and the Council’s intention to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt. Since the designation of land as Green Belt has significant implications for the operation of the presumption in favour of sustainable development, this intention has the potential to significantly restrict the delivery of housing during the plan period. Moreover, due to the requirement of the NPPF that Green Belt boundaries should endure beyond the Plan period, the Council’s intention is likely to restrict the ability of the area to accommodate housing development in the future, particularly since this land relates to areas at sustainable settlements such as Tongham.

The Council’s intention to designate the land to the north of Poyle Road, Tongham as Green Belt is flawed. This land does not contribute to the Green Belt purposes defined in the NPPF and reduces the capacity of a sustainable settlement to accommodate development. The Council’s approach of assessing sites on the basis that they are proposed to be designated as being within the Green Belt is fundamentally flawed and represents an artificially constrained view of
housing land availability within the Borough. The flawed nature of this approach is highlighted by the fact that the Council is seeking to restrict the housing requirement earlier in the Plan period.

We consider that the land north of Poyle Road, Tongham which is the subject of a live application for up to 150 residential dwellings (GBC ref 17/P/01315) represents a sustainable location for development, adjacent to a sustainable settlement as defined by the Council’s own hierarchy. In addition this land is not subject to environmental restrictions in the adopted Local Plan which indicate that development cannot be accommodated. The site is not subject to any environmental or landscape designations and is not within the Green Belt. Although the land is proposed to be designated as Green Belt, the site does not perform the purposes of Green Belt as defined by the NPPF.

We consider that the concerns outlined in these representations result in the Proposed Submission Local Plan being unsound when assessed against paragraph 182 of the NPPF which requires a Plan to be positively prepared; justified; effective; and consistent with national policy.

In this case, the Proposed Submission Local Plan is unsound because:

• It is not positively prepared. No provision has been made for the unmet housing needs of other authorities and the Council’s approach to the Green Belt provides little opportunity to do so and little opportunity to resolve the existing housing supply shortfall. No provision has been made for the unmet housing needs of other authorities and the Council’s approach to the designation of additional Green Belt land provides no flexibility to do so. In addition, the Plan does not provide a situation whereby development can be accommodated by virtue of the presumption in favour of sustainable development as a result of the decision to designate additional land (at sustainable locations) as Green Belt and is of particular concern given the housing supply position in the Borough.

• It is not justified. The plan is not the most appropriate strategy when considered against the reasonable alternatives. The evidence does not support the identification of the Land north of Poyle Road, Tongham as being within the Green Belt. The decision to discount sites from further assessment due to the Council’s intention that they be designated as Green Belt is fundamentally flawed and represents an artificially constrained view of housing and land availability within the Borough.

• It is not effective. The Plan is not deliverable over the Plan period since it artificially restricts the availability of land within the Borough and results in a situation where the presumption in favour of sustainable development is unlikely to apply to much of the Borough.

• It is not consistent with national policy. The Local Plan does not meet the OAN and does not provide for the unmet needs of adjoining authorities and other areas. The Local Plan is also not prepared on the basis of planning for sustainable patterns of development and The intention to designate land, such as the land north of Poyle Road, Tongham is inconsistent with national policy as the land does not serve the Green Belt purposes. Moreover the Council’s approach to the designation of additional areas of Green Belt results in a situation where the permanence of the Green Belt cannot be maintained.

We can confirm that we intend to attend the Examination in order to address the matters contained in these representations.

We trust that these representations are useful and would be grateful for confirmation that they have been received and registered as being duly made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Executive Summary

This set of representations are made on behalf of Countryside Properties PLC to Guildford Borough Council’s (GBC) Proposed Submission Local Plan: Strategy and Sites (June 2017). The representations are made in response to the Council’s decision to exclude Land South of New Pond Road Farncombe (Land Availability Assessment Ref: 2241) as a residential allocation in the Regulation 19 Proposed Submission Local Plan. The site was previously identified as part of a residential allocation (number 80) within the 2014 Draft Local Plan.

Our representations address the following key matters

- The lack of any justification for the Council seeking to reduce the length of the Plan period.
- Worsening affordability issues in Guildford Borough together with a failure to make and appropriate uplift to the OAN to take account of the very high affordable housing requirement that has been identified, and immigration from London.
- The Council’s very poor 5 year Housing Land Supply and recent housing completions record.
- The urgent need to boost Guildford’s housing supply by bringing forward sites lacking in serious constraints.
- The complete absence of any commitment or strategy to help address and tackle unmet need within the wider Housing Market Area, in particular, with regard to Woking, being a failure under the Duty to Co-operate.
- There being an undue focus in the Local Plan upon very low Annual Housing Targets set in the early years of the Plan period solely to ensure that the Council maintains a 5 Year Land Supply. This being at the expense of significantly boosting the housing supply and tackling its Objectively Assessed Need (OAN). Particularly given that the stated target figures fail to meet the Council’s identified overall housing target figure.
- As a consequence of the Draft Plan placing a very heavy over-reliance on development at the back end of the Plan period, it is not considered to be in accordance with the national policy guidance.
- The valuable contribution that our client’s site at New Pond Road, Farncombe can make to boosting the Council’s 5 Year Land Supply is discussed.

Representations on Policy S2: Borough Wide Strategy

Introduction

1. These representations are submitted on behalf of our client CountrysideProperties (PLC) and relate to the Guildford Borough Proposed Submission Local Plan Strategies and Sites document (June 2017) and supplement our earlier comments with regard to the June 2016 consultation. These earlier representations contain a suite of detailed evidence which includes the following documents:

- JBPA Promotional Brochure;
- Barton Willmore Landscape & Visual Appraisal;
- Barton Willmore Site Comparison Study;
- JBPA Site Comparison Study;
- Cgms Archaeological Desk Based Assessment;
- Cgms Heritage Statement;
- Amazi Flood Risk Assessment;
- PJC Extended Phase 1 Habitat Survey;
- RGP Transport Statement Technical Note; and
- Rural Solutions Sustainability Appraisal.

2. Representations were also previously submitted at the Regulation 18 stage in November 2013 in relation to the Guildford Borough Local Plan Strategy and Sites Issues and Options document and in September 2014 at the Draft Plan stage.

3. We comment in these representations on the following matters:

- The inappropriateness of a reduced housing requirement figure;
- Inadequate Annual Housing Targets;
- A failure to address urgent affordability and lack of housing supply pressures;
- The lack of justification for the reduction in the proposed length of the Plan period;
• The unacceptability of back-loading housing provision to the end of the Plan period;
• A failure of the Duty to Co-operate in terms of addressing unmet housing need; and
• Support for the deletion of the proposed housing allocation at Normandy, but criticisms of other elements of the identified housing supply.

4. Our client controls land South of New Pond Road, Farncombe (see Appendix 1 – Site Location Plan). The site is capable of delivering circa 90 dwellings in the short term and could therefore contribute to Guildford Borough Council (GBC)’s 5 Year Housing Land Supply. Indeed, in 2014 a previous version of the emerging Guilford Local Plan identified the site as a part of a proposed housing allocation number 80 (see Appendix 2 – Proposed Housing Allocation Plan), which shows the boundaries of the housing allocation proposed in the 2014 version of the Draft Local Plan, however it was subsequently removed as the Council considered that the site (number 80) was no longer required as a proposed housing allocation. We outline below why we consider GBC’s stance to be wrong with respect to this matter.

5. Site number 80 is comprised of three parcels of land. The furthest west is land that we are promoting on behalf of our client Countryside Properties. To the east, in the central part of the site, is land associated with New Pond Cottage and New Pond Farm. The furthest east is land promoted by Obsidian Land Promotion (Guildford) Ltd on behalf of Podger Estate. Our previously submitted Landscape and Visual Appraisal by Barton Willmore (July 2016) found that New Pond Road provides a strong and robust physical feature on the ground that makes a limited contribution to the four assessed Green Belt purposes. It also makes a limited contribution to the (defined) special qualities that are intrinsic to designating an AONB. The Site is well located to existing local shops and services, schools and is considered to meet the three dimensions of Sustainable Development.

Plan Period

6. The latest (June 2017) version of the Proposed Submission Draft Local Plan proposes to amend the Plan period to 2015-34 from 2013-33. Consequently, there is a reduction of 1,434 dwellings, and the Plan period is reduced by a year. We fail to see what justification there is for GBC’s decision to reduce the length of the Plan period and roll its start date forward by 2 years. There does not appear to be any rational explanation offered to indicate why a reduction in the Plan period (which reduces both long-term certainty as well as the total overall identified housing supply) is either necessary or appropriate.

7. The change to the plan period to 2013 - 2032 seems somewhat arbitrary, particularly given that the SHMA modelling for the Housing Market Area (HMA) relates to 2013 to 2033, which continues to form an essential part of the evidence base for the emerging Local Plan.

SHMA

8. Paragraph 2.9 of GBC’s Topic Paper: Housing Delivery (TPHD) states that the West Surrey SHMA: Guildford Addendum Report (2017) provides a factual update to the West Surrey SHMA (2015). The Addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 midyear population estimate. This factual update has resulted in a reduced Objectively Assessed Need (OAN) for Guildford from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). Over the Plan period, this has resulted in a reduction of approximately 1,400 homes. There were 381 homes completed in 2015/16 and 297 in 2016/17 which has resulted in an under delivery of new homes against OAN, leading to an expected backlog of 1,319 dwellings by the time of the Local Plan’s adoption.

9. It is important to note that the West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report (March 2017), prepared by GL Hearn, has been solely commissioned by GBC. Therefore, it solely seeks to address Guildford’s housing needs without due consideration of wider needs across the HMA and brings into question the effectiveness of the Duty to Co-operate requirements.

10. The Planning Practice Guidance (PPG) indicates that the most up-to-date household projection figures should be used as the starting-point in determining the OAN. In this case it is the 2014-based figures.

[See attachment for Tables]
11. The above two tables indicate that both the CLG Household Projections and Sub National Population Projections (SNPP) for 2014 show increases upon the 2012 based household and population figures. It is noteworthy that despite the 2012 based figures being used as the basis for the 2015 SHMA, and the more recent 2014-based figures underpinning the 2016 SHMA Update, GBC is now seeking to reduce the emerging Plan’s overall housing requirement figure.

12. The 2016 version of the Draft Plan makes reference (paragraph 2.21) to Guildford’s average house price needing to now being amended to £445,524 from £407,160, which fully demonstrates the urgent need to address housing delivery. This points to the fact that smaller less constrained sites such as the one being promoted on behalf of our client at Farncombe, can play a very important role in boosting housing supply in the short term to take account for longer lead in times for larger strategic development sites. Consequently, we consider that GBC’s proposed phasing timetable of the Borough’s housing provision to be seriously defective given that it will harm rather than assist in boosting the delivery of the Submission Draft Plan’s identified housing supply.

13. Table 24 in the updated SHMA (2017) indicates that 517 households per annum require support in meeting their housing need (compared to 478 in the 2015 SHMA).

14. Paragraph 5.23 states that with 40% affordable housing delivery, 1,293 dwellings pa would be required in order to address the affordable housing need in full.

15. Other important findings from the Assessment were:
   - Land values are 16% above the Housing Market Area (HMA) average;
   - Annual house price growth of 7.5% occurred over the past 5 years in Guildford;
   - There has been a substantial £45,000 increase in average house prices in Guildford over the past year (paragraph 5.34);
   - Lower quartile house prices are 11.5 x earnings in the Borough;

16. Reference is made in paragraph 5.49 to 629 dpa being required to support the rebased SNPP. To support economic growth, a marginally higher level of provision (631 dpa) would be needed. However, paragraph 8.17 goes on to state that applying a market signals adjustment to the economic-led need for 579 dpa results in an upward adjustment of 9%, increasing the assessed housing need to 631 dpa.

17. It is not evident why the 579 dpa figure, has been used in preference to the 631 dpa requirement.

18. Furthermore, given the findings of the updated SHMA (2017), which are referred to above, in particular, the market signals showing a housing market experiencing extremely severe affordability issues, only a very modest uplift of 9% above the economic-led need of 579 dpa is deemed sufficient. The identified OAN of 654 dpa is stated in paragraph 5.49 to 629 dpa being required to support the rebased SNPP. To support economic growth, a marginally higher level of provision (631 dpa) would be needed. However, paragraph 8.17 goes on to state that applying a market signals adjustment to the economic-led need for 579 dpa results in an upward adjustment of 9%, increasing the assessed housing need to 631 dpa.

19. We refer back to the evidence which we submitted to the 2016 emerging Local Plan consultation. In particular, the Nathaniel Litchfield & Partners report (July 2016) that criticised the methodology of the SHMA. The findings of which remain applicable.

**OAN**

20. The OAN Housing Target has changed to 12,426 dwellings (previously 13,860 dwellings). The Housing Target equates to 654 dpa in accordance with the SHMA Addendum (2017) (previously 693 dpa in accordance with the West Surrey SHMA – September 2015).

21. GBC states in paragraph 4.6 of the TPHD that for the purposes of its plan-making process, it has assumed an unmet housing need for Woking of 3,150 homes (2013/14 – 2026/27). This figure was recently been agreed by the Inspector and interested parties at the Waverley Local Plan Examination Hearing Sessions.
22. In our previous representations we referred to the unmet need arising from Woking, which has been assumed to be 3,150 dwellings for the period 2013/14 – 2026/27. The Inspector at the Waverley Local Plan Hearing Sessions confirmed his position that Waverley Borough Council and GBC would be required to accommodate unmet need from Woking. GBC should therefore seek to establish what proportion of this can be accommodated within Guildford.

23. There also appears to be a notable lack of information with regard to whether or not there will be any further amount of unmet housing need from Woking, beyond 2027, which might also need to be met by Guildford in the latter part of its Plan period.

24. We are disappointed that the Council is seeking to reduce its overall housing requirement by 1,400 dwellings in the 2017 Proposed Submission Draft Local Plan. The 2017 Addendum to the SHMA now indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa.

25. We consider that undue weight has been given to employment forecasts, particularly given that these only relate to Guildford, rather than the wider HMA. This is contrary to the Planning Practice Guidance (PPG) which specifies that employment trends and growth in working age population should be considered across the HMA.

26. It is also considered important to recognise other economic factors that are highly pertinent in determining the OAN. The demographic baseline and affordability issues point towards a need for an increase, rather than a decrease, to the OAN. The baseline level of housing need in the Borough, as identified in the 2017 SHMA Addendum, has risen from 517 dpa to 552 dpa. It must also be recognised that this is the mid-point assessment with the highest demographic projection being 584 dpa.

27. We referred in our 2016 Draft Local Plan representations to deficiencies in the production of the original SHMA. We would refer back to our earlier submission, in particular, the Nathaniel Litchfield & Partners Report (July 2016) that presented a critique of its methodology.

28. There is clearly an increasing need for housing within the Borough. Table 24 in the 2017 SHMA Addendum shows the need for affordable housing has increased from 478 dpa to 517 dpa. Table 25 refers to continued house price inflation of 7.5% per annum over the last 5 years, with an 11.4% increase over the past year. Paragraph 5.32 acknowledges that “It is clear that house price growth has accelerated in the Borough since mid-2013”.

29. Recent levels of housing delivery have been weak in the Borough. As a result, increasing demand and worsening affordability have contributed to making the Borough housing increasingly inaccessible for many of its residents. This is also demonstrated by the 2017 SHMA Addendum which reports that the number of households being formed by the crucial 25 - 34 age group have reduced.

30. Clearly there are affordability pressures that are reducing household formation in this age bracket. Poor housing delivery in Guildford Borough has compounded this situation. This worsening scenario has led to the situation identified in paragraph 5.27 of the 2017 SHMA Addendum which indicates that lower quartile house prices are 11.5 times the lower quartile earnings in the Borough. Market signals would suggest the need for a more significant uplift on the latest demographic baseline, rather than the reduction that is being proposed by GBC.

31. We also continue to consider that the Plan fails to make adequate provision for population flows from London given the capital’s sky-high property prices and Guildford’s close proximity. Please see our 2016 Local Plan representations for further details. These included evidence that In-migration from London indicated that more than 1,000 dwellings would be required in Guildford and up to 1,200 dwellings across the West Surrey HMA. It is important to remember that the Inspector’s Report in respect of the London Plan concluded that the London Authorities could not meet their Objectively Assessed Need for 52,000 dpa, nor their target of 49,000 dpa. Instead, there was found to be an identified capacity figure of only 42,000 dpa. It is important that GBC can demonstrate it is taking proper account of any contribution required in response to assisting in meeting housing needs arising from London, including emerging evidence being made available as part of the evidence base for the new London Plan.

32. We comment below upon the content of the following Table which is now shown as deleted text under revised Policy S2. The Table sets out the Annual Housing Target figures from the 2016 Submission Draft Version of the Guildford Local Plan. [See attachment for Table 3]
33. The previous 2016 Submission Draft OAN of 693 pa required provision of 13,860 dwellings over the Plan period. It is apparent from the above Table that GBC’s annual housing target figures would deliver 10,395 dwellings. In addition, 1,057 dwelling completions can be added for the first three years of the originally proposed Plan period (2013/14, 2014/15, 2015/16 & 2016/17). This would have provided a total of 11,452 dwellings. This would have still left a deficit of 2,408 dwellings to meet the OAN for the Plan period which would have needed to be bridged by an extremely high housing target figure in 2017/18.

34. Rather than an annual target applicable to each year of the Plan period, the housing supply is phased in order to show a 5 year land supply. The initial Annual Housing Target figures are very low. They appear to have been chosen entirely as a means of ensuring that GBC can maintain a 5 Year Land Supply (albeit a very low one). They are incapable of boosting short-term housing supply or addressing affordability concerns and poor recent completion numbers.

35. It is also worth noting that in the first 5 years of the Plan post adoption, the annual housing targets would have delivered 2,950 dwellings, or an average of 590 dpa.

36. The following Table is now shown as proposed new text under revised Policy S2. The Table sets out the Annual Housing Target figures from the 2017 Submission Draft Version of the Guildford Local Plan. It shows that it will take until the late 2020’s before housing delivery rates rise significantly above the OAN target of 654 dpa. [See attachment for Table 4]

37. The proposed 2017 Submission Draft OAN of 654 pa results in a required provision of 12,426 dwellings over the Plan period. It is apparent from the above Table that GBC’s annual housing target figures would deliver 9,810 dwellings. In addition, 381 dwelling completions can be added for the initial year of the revised proposed Plan period (2015/16) and 297 completions for the second year (2016/17). This would have provided a total of 10,488 dwellings. This still leaves a deficit of 1,938 dwellings to meet the OAN for the Plan period which will need to be bridged by the housing target figures for 2017/18 and 2018/19. This will require housing target rates of 969 dwellings in both of these years. It is not apparent how this step-change in delivery will be achieved prior to the new Local Plan being adopted.

38. Paragraph 4.1.9a in the 2017 Draft Submission Local Plan clearly states that “the figures set out in the Annual Housing Target table sum to a total of 12,426 homes”. This statement is quite clearly inaccurate given that as we have already stated above, the Council’s total identified housing supply only amounts to 9,810 dwellings. GBC needs to urgently clarify how its annual housing targets will actually address and deliver its OAN.

39. In the first 5 years of the Plan post adoption, the annual housing targets will now only provide for 2,400 dwellings, or an average of 480 dpa. This is a significant reduction in housing delivery against the already low figure of 2,950 dwellings (an average 590 dpa) proposed in the 2016 version of the Submission Draft Local Plan.

40. Given recent poor housing delivery rates, worsening affordability and a significant current unmet housing need within the HMA, we are concerned that GBC is seeking to reduce the OAN and introduce even lower annual housing targets in the early years of the Plan period. Such an approach is not considered sound as it is contrary to the National Planning Policy Framework (NPPF). It will not seek to significantly boost the supply of existing housing. Nor will it seek to address the significant housing supply backlog that will have accrued by the time of the Plan’s adoption.

41. Instead, the proposed strategy with its amended Annual Housing Targets in Policy S1 now places even greater emphasis on back-ended housing delivery towards the finish of the Plan period. This is a high-risk approach as it means there is a greater risk that the Plan will fail to meet its housing requirement should any of its major sites allocations fail to deliver as envisaged. In such circumstances, GBC will have much less time to address and rectify such shortfalls in delivery. This is an especially important issue given that GBC openly acknowledges in its evidence that a number of its site allocations are heavily dependent upon new infrastructure provision.

42. The proposed Annual Housing Target figures seems to be an attempt by GBC to delay delivery and not seek to meet housing need earlier in the Plan period, particularly given that that need has been significantly increasing. The Council must identify a wider range of sites and in particular smaller sites, which can deliver housing in the short term. The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply.

43. GBC is not explicit in the Topic Paper: Housing Delivery – June 2017 (TPHD) whether it is proposing to use the Sedgefield or Liverpool approach to assessing five year supply. However, the statement in paragraph 4.188 appears to
suggest that it will be seeking to address backlog over the full Plan period (The Liverpool method). This is not the
approach favoured in the National Planning Practice Guidance (NPPG). We can see no reason why allocated sites should
not be brought forward as early as possible.

44. Our view is that, in accordance with national policy, the Sedgefield method is used to ensure that the backlog is
delivered as quickly as possible and not ‘put off’ until later in the Plan period. We consider it important to note that
Waverley Borough Council and Waverley Housing Forum signed a Statement of Common Ground in which they both
agreed that the Sedgefield approach should be used with regard to the 5YLS. We support GBC’s application of the 20%
buffer to take account of the persistent under delivery of housing in the Borough.

45. Paragraph 4.188 of the TPHD reports that the housing target from the base date (2015) to adoption of the Plan (2019)
is 654, and envisaged backlog at the point of adoption is therefore 1,319 homes. GBC acknowledges that the NPPG says
that local planning authorities should aim to deal with any undersupply within the first five years of the Plan period where
possible.

46. Applying the Sedgefield methodology from a base of 2019/20 means that the Council will need to address a backlog
of 1,319 dwellings between 2019/20 and 2023/24. In terms of the 5-Year Housing Land Supply, accepting Annual
Housing Targets of 450 dpa in the first two years and 500 dpa in the last three years would result in a need for 2400
dwellings (480 dpa). However, as we have already indicated above. We consider that these target figures are too low, and
that GBC should be seeking to address its OAN and housing shortfall as soon as possible. A reduced OAN of 12,426
dwellings still results in a requirement of 654 dpa over a 19 year Plan period.

47. Both the NPPF and the NPPG emphasise the importance of LPA’s seeking to address both their annual housing
requirement over the Plan period and their housing backlog in the first five years of a new Local Plan.

48. Paragraph 47 of the NPPF states LPA’s should “…. identify and update annually a supply of specific deliverable sites
sufficient to provide 5 year’s worth of housing against their housing requirements with an additional buffer of 5%
(moved forward from later in the plan period) to ensure choice and competition in the market for land.
Where there has been a record of persistent under delivery of housing, local planning authorities should increase
the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the
planned supply and to ensure choice and competition in the market for land…”

49. The NPPG says that “Local planning authorities should aim to deal with any undersupply within the first 5
years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities
will need to work with neighbouring authorities under the duty to cooperate” (Paragraph: 035 Reference ID:
3-035-20140306).

50. It is important to point out that should GBC follow this approach, this would result in a total of 4,589 dwellings, to
which a 20% buffer needs to be applied to reflect recent under-delivery (654 dpa x 5, together with the envisaged housing
backlog of 1,319 dwellings at the point of adoption (paragraph 4.188 of the TPHD)). This gives an initial 5-year
requirement of 5,507 dwellings, or 1,101 dpa. GBC’s Annual Housing Figure is only just over 40% of this figure. This
demonstrates just how ineffective and unambitious the Proposed Submission Draft Plan (2017) is in terms of boosting
Guildford’s 5YLS.

51. The Sedgefield methodology demonstrates that even a trajectory skewed towards the later part of the Plan, fails to
provide GBC with sufficient housing supply to meet its requirements during the first five years of the plan. This calls into
question the effectiveness of the Plan and that, in accordance with paragraph 49 of the NPPF, policy S2 could be
considered out of date from the point at which the Plan is adopted. As such we believe the plan is unsound as it is not
consistent with national policy and nor is it effective as there are serious doubts as to whether it is deliverable over the
plan period.

**Duty to Co-operate**

52. We reiterate our earlier expressed concerns regarding Guildford Borough Council (GBC)’s co-operation with its
fellow Housing Market Area members; Waverley Borough Council (WaBC) and Woking Borough Council (WoBC). The
Woking Core Strategy sets a housing requirement of 225 dpa below the OAN of 517 dpa identified in the West Surrey
SHMA (2015).
53. As a consequence, there is a significant amount of unmet housing needs within Woking and that consideration needs to be given how this unmet need is going to be addressed within the HMA. This issue was raised by the WoBC Core Strategy Examination Inspector.

54. WoBC adopted its Core Strategy in 2012. The Plan covers the period 2010 – 2027. The Council is still to produce a Site Allocations Development Plan Document (SADPD) which will identify and allocate sites for development to cover the period up to 2027, including provision for 292 dpa. WoBC acknowledged in its written submission to the Waverley Local Plan Examination that given its current OAN of 517 dpa that there is currently an unmet housing need arising from Woking, which still needs to be addressed.

55. Furthermore, the Council also made it clear in its written submission that a review of overall housing number will not take place until there is a future review of the Core Strategy, and that this will only occur after the SADPD has been produced and adopted. The SADPD is not intended to identify sites to meet unmet need within the Housing Market Area.

56. We understand that during the current Waverley Draft Local Plan Examination Hearings the Inspector indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking.

57. Given the unmet needs of the HMA, together with significant affordability pressures, it is somewhat surprising that the Council has chosen to reduce its overall Local Plan housing requirement by 1,400 homes.

58. Whilst the TPHD does refer to the issue of unmet need in relation to the reduced housing requirement, this is in regard to the relative appropriateness of using specific allocations to address unmet needs from other authorities. In particular, GBC concentrates upon the potential adverse impacts in relation to some allocations. Further deliberation doesn’t appear to have been given to the benefits of meeting the wider housing needs of the HMA given the level of need and significant affordability issues identified in the West Surrey SHMA. The focus being on perceived environmental harm, rather than the economic and social consequences of the Plan failing to deliver sufficient new homes to meet current and future needs.

59. Despite there continuing to be a significant level of unmet need across the HMA, there does not appear to be any commitment from GBC with regard to helping to meet Woking’s unmet housing needs. Instead, it is seeking to reduce its own housing requirement. The consequences for GBC of failing to fulfil its legal obligations under the Duty to Co-operate are very serious. Local Plan Examination Inspectors elsewhere have advised local authorities to withdraw their Plans as a result of failing to work with other Authorities to address unmet needs. St Albans District Council is but one such example. In its case, a recent High Court challenge by the Council against its Local Plan Examination Inspector’s findings failed. The Court reiterated the importance of ongoing engagement to address strategic policy matters of a cross-boundary nature.

60. We are very concerned that despite this unmet need being known about for some considerable period of time now, there does not appear to be any mechanism in place to actually address this important matter. Accordingly, it does not appear that the Plan has been positively prepared as required by the NPPF.

61. It is particularly noteworthy, that unlike WaBC who has been advised that it will be required to accommodate a significant proportion of Woking’s unmet need, GBC is not seeking to address any of this unmet housing need. Given the fact that Woking has already accrued a very significant backlog of unmet housing need, it is a particular concern if tackling the HMA’s deficit is a matter that is not sufficiently addressed and left to be sorted out at some unknown point in the future.

62. We consider that in order to comply with the NPPF, GBC must be able to demonstrate that the Draft Local Plan has sought as far as possible, to assist in meeting the HMA’s unmet housing needs, in the same way as Waverley is doing. We do not consider that the available evidence demonstrates this, particularly given GBC’s decision to reduce its overall housing target figure for the Plan period.

63. It is fully apparent that co-operation between the 3 local authorities within the HMA has been ineffective with regard to ensuring that its overall housing needs are addressed and met.
64. We would reiterate that our client’s site at Farncombe was previously identified as a part of proposed housing allocation (number 80) in the 2014 iteration of the emerging Local Plan. Furthermore, WaBC did not object to this allocation. Indeed, it agreed to work with GBC on reviewing the Green Belt.

65. There is a clear need to reconsider the release of land from the Green Belt and AONB around larger villages where it is of lesser sensitivity in terms of landscape or environmental value. We submitted evidence at the time of the 2016 Local Plan consultation to demonstrate why our client’s site at Farncombe fully merits release.

**Housing Delivery**

66. In our previous representations we referred to the following table in the 2016 Housing Delivery Topic Paper (paragraph 4.169), which shows that housing completion rates over the last decade have been low. It also demonstrates a record of under delivery of new homes against the OAN, leading to a significant backlog accruing over a short period of time. We have updated this by adding 2 No. additional rows to incorporate the annual housing completions for 2015/16 and 2016/17 as recorded in the Council’s Topic Paper: Housing Delivery (June 2017).

**Housing Completions**

[See attachment for Table 5]

67. The Land Availability Assessment states (p.12) that the five-year housing land supply for 2016/17 (which covers the monitoring period 1st April 2017 to 31st March 2018) is only 2.36 years. More recently (July 2017), WYG has published an information sheet listing the current 5 Year Housing Supply position for LA’s in the South East and East regions as of June 2017 (see Appendix 3). Worryingly, Guildford’s 5YLS is shown as having deteriorated further and now being reduced to just 2.1 years of housing land supply. Furthermore, GBC is listed amongst the bottom 10 LA’s in terms of housing land. Therefore, sites capable of delivering housing in the short term and contributing to boosting the 5YLS (such as our site) need to be allocated. Otherwise, GBC’s dire 5YLS and affordability positions will continue to worsen. Policy S2 as currently drafted will only reinforce GBC’s record of persistent under-delivery. Furthermore, the Local Plan would be out of date at Adoption given that against the Council’s annual housing requirement and backlog it would be incapable of demonstrating the existence of a 5YLS.

[Text continues in next comment]

[See attachments for Appendices]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- [Tables attached to rep.pdf](24 KB)  
- [Appendices.pdf](3.2 MB)

**Comment ID:**  
pslp171/1473  
**Respondent:** 17397857 / Countryside Properties (Leah Needham)  
**Agent:** JB Planning Associates (John Boyd)

**Document:**  
Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?**  
( No )  
**is Sound?**  
( No )  
**is Legally Compliant?**  
( No )

[Text continuing from previous comment]

**Site allocations**

68. In paragraph 3.8 of the TPHD it is stated that when developing new Local Plans, the Council must weigh up the constraints and test different options regarding how much development can be accommodated. For Guildford these
include the Surrey Hills Area of Outstanding Natural Beauty, the Thames Basin Heaths Special Protection Area, Green Belt, flood risk and infrastructure capacity, such as the road network.

69. Paragraphs 3.13 and 3.14 of the TPHD state that the Land Availability Assessment (LAA) has been prepared using the methodology set out in the NPPG. Previous SHLAAs did not use a site size threshold but for this LAA, the recommended size threshold of five or more homes has been used. The LAA is important evidence but it does not itself determine whether a site should be allocated for development, nor does it grant planning permission. The LAA has not been updated for the Regulation 19 Local Plan (2017) however an addendum has been prepared which provides a factual update and information on the changes to the site allocations. GBC has used the LAA (2016) to inform housing supply from non-allocated sites.

70. As a consequence, approximately 1,400 homes have been lost from the Regulation 19 Local Plan (2016) through the removal of sites that are no longer considered suitable for allocation for a variety of planning reasons (e.g. site unavailability and alternative uses being proposed).

71. GBC states in paragraph 4.11 of the TPHD that its spatial strategy continues to seek to meet its OAN. The Regulation 19 Proposed Submission Local Plan (2016) identified a housing target of 693 which equates to 13,860 homes over the plan period (2013-33). However, the identified supply was approximately 15,844 which represented a 14% buffer over and above the housing requirement. The buffer ensured that it was able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change, as required by paragraph 14 of the NPPF. It also provided a robust supply of housing sites to ensure that the housing requirement was met reflecting the uncertainties related to the delivery of certain key infrastructure that is considered necessary to ensure the planned growth is sustainable. In particular, a number of our strategic sites are dependent upon the delivery of Highways England’s A3 Guildford scheme. Due to the completion of the scheme only being expected by 2027, a proportion of the supply is assumed to be built after this date.

72. GBC refers in paragraph 4.12 of the TPHD to the fact that the Regulation 19 Local Plan (2017) has a reduced overall housing provision figure. It says that prior to the removal of sites, it first explored whether they could potentially be retained in order to meet unmet needs arising from elsewhere in the HMA. Having undertaken the exercise it continues to consider that these sites are not appropriate for allocation and should continue to be removed for good planning reasons, based on either new evidence or changing circumstances.

73. We consider GBC’s remarks in paragraph 4.13 of the TPHD to be very important. This states that whilst every effort has been made to maximise sustainable sites that are able to deliver in the first five years, there remains a significant shortfall when taking account of the deficit accrued since 2015 and the 20% buffer brought forward from later in the plan period. The Regulation 19 Local Plan (2017) therefore continues to propose a phased target which begins at a relatively low level in the early years (now even lower than previously proposed) and increases thereafter in line with the expected delivery of infrastructure and strategic sites. GBC goes on in the following paragraph to say that its own continued shortfall in the early years, therefore, reinforces the inability to meet unmet needs arising from within the HMA. We do not believe or accept that there are not sites available which could be brought forward in the short-term and help address any unmet need across the HMA. We comment below on our client’s site at Farncombe.

74. Paragraph 4.16 in the TPHD explains that the Regulation 19 Local Plan (2017) has a reduced overall housing supply of approximately 2,000 homes. Approximately 1,400 homes have been lost from the Regulation 19 Local Plan (2016) through the removal of sites that are no longer considered suitable for allocation for a variety of planning reasons, irrespective of OAN. The remaining 600 homes are as a result of a more realistic phasing assumption on two strategic sites.

75. Reference is made in paragraph 4.164 of the TPHD to the deletion of the proposed allocation of 1,100 dwellings at Normandy and Flexford. We very much welcome the fact that the Council has taken note of the objections of ourselves and others that were made to the 2016 Submission Draft Local Plan consultation. Consequently, we fully support the de-allocation from the Draft Submission Local Plan of 1,100 dwellings at Normandy and Flexford.

76. However, we consider that that pushing housing delivery back to further on in the Plan period is contrary to NPPF requirement to boost housing delivery and demonstrates a lack of confidence of officers with regard to the deliverability of their sites.
77. We note that 2017 Draft Submission Plan makes provision for two increased housing allocations at New Street, Guildford (an extra 200 dwellings) and land south and east of Ash and Tongham (an extra 550 dwellings).

78. GBC states that it now considers that Guildford town centre will deliver 1,150 homes to 2034 (paragraph 4.57 of the TPHD).

79. There are acknowledged to be deliverability concerns on some sites, primarily related to sites where there is not a suitable relocation option available (paragraph 4.59). For example, Guildford library, and adult education centre (removed in the Regulation 19 Local Plan (2016)). The loss of these uses would not be acceptable without a suitable alternative available location. In addition to this and as set out above the Telephone Exchange has also been removed from the Regulation 19 Local Plan (2017) on the basis of availability and deliverability concerns.

80. The extra 200 dwellings at Site A6 in the urban area (North Street redevelopment, Guildford town centre) arises as a result of reduced comparison retail floorspace from 45,000 sq m to 41,000 sq m and increased food and drink element from 3,000 sq m to 6,000 sq m. The increased housing capacity from 200 studio/1-bed flats to 400 homes has resulted from a change in the retail provision to reflect the latest retail needs study and evidence of demand for comparison/food and drink retail uses. GBC states that the change in housing reflects the aspirations of the site promoters.

81. The site is identified in the 2016 LAA as Site 205. It is identified as currently being a mix of uses including bus station, retail and food and drink, surface car park, office, shops and some vacant properties. Over the last three decades there have been several outline planning permissions and reserved matters details approved for comprehensive mixed use redevelopment including retail, flats, restaurants and cafes (Class A3), community space (Class D1), car parking, replacement bus station, a public square. The most recent of these expired in 2015.

82. The North Street site is said to be the only opportunity within the proposed primary (core) shopping area on which to provide a significant amount of additional retail floorspace to meet future needs, to consolidate the role of the town centre. It has potential to greatly improve the appearance and function of the area. Due to the site’s town centre location and a number of historic industrial activities in the vicinity, investigation and potential remediation may be required prior to any redevelopment. Depending on the proposals for development of the site, the bus interchange facilities that are presently provided at Guildford bus station on the site may need to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site.

83. It is apparent that the North Street site has been promoted as a development opportunity for a considerable period of time. The deliverability of this site is therefore questioned, particularly if bus facility provision or relocation is required. Furthermore, it is noteworthy that increased housing provision on this site would, in the Council’s own judgement, be to the detriment of town centre retail provision.

84. The Guildford urban area (including Slyfield Area Regeneration Project, but excluding Guildford town centre) is said to be likely to generate 1,450 homes to 2034 (paragraph 4.62 of the TPHD). The Slyfield Area Regeneration Project itself (A24) is said to have a capacity of 1,500 homes with 1,000 homes expected to be delivered in the Plan period due to development being dependent upon the relocation of the Sewage Treatment Works (paragraph 4.67 of the TPHD).

85. The Plan allocates 1,750 homes (was 1,200 homes) on land to the south and east of Ash and Tongham (A29). The allocation has been increased to include the planning permissions in the area that have not yet commenced due to the current unavailability of Suitable Alternative Natural Greenspace (SANG). The Site also includes land for a new road and footbridge over Ash.

86. In relation to Ash and Tongham, paragraph 4.108 of the TPHD says that the number of homes proposed in this area roughly compares to the number of homes proposed at former Wisley airfield (2,000 homes), but without much of the supporting uses and infrastructure. The piecemeal nature of this site in terms of its fragmented ownership and how it is being delivered, in part ahead of the Local Plan without CIL, means housing is being provided without many of the additional benefits.

87. The Plan allocates approximately 2,000 dwellings (was almost 1200 dwellings) on sites in and around existing villages.
88. At least 3,200 units will be provided in 2 urban extensions, north east of Guildford at Gosden Hill Farm, and SW of Guildford at Blackwell Farm (was 4,000 dwellings); and Wisley new settlement to contain approximately 2,000 dwellings (was over 2,000 dwellings).

89. We consider that there are serious question marks regarding the reliability of envisaged housing delivery from a number of the sites referred to above. In particular, North Street, Guildford (A6) is a long standing re-development proposal whose re-development would require the provision of new bus facilities and be to the detriment of retail provision in Guildford town centre. Slyfield Area Regeneration Project (A24) requires the relocation of sewage treatment works which is likely to be both expensive and time-consuming. Whereas increased housing provision at Ash and Tongham (A29) involves complex land and multiple site ownerships which are likely to make it difficult to co-ordinate and deliver development on the ground in a timely manner.

90. GBC specifies that whilst only sites that are key to the delivery of its strategy are allocated, as required by the NPPF, the LAA identifies all sites that are suitable, available and achievable for housing and economic development uses over the Plan period (paragraph 4.35 of the TPHD). As a general principle, GBC considers that sites key to delivering its strategy are those that are in excess of approximately 25 homes or are delivering other specific use classes. Whilst they are not all formally allocated in the Proposed Submission Local Plan, all homes identified in the LAA (the LAA has a threshold of five homes or more) have been counted in terms of calculating GBC’s supply. In addition to this, GBC’s supply also includes assumptions on non site-specific sites, namely windfall and Rural Exception Sites, and information on outstanding permissions and completions.

91. We consider that there are question marks concerning the realistic delivery of a number of sites recorded in the LAA. We note that some sites in the LAA have been promoted for many years, some have multiple land ownerships, and some have never been actively promoted by landowners.

92. GBC acknowledges in paragraph 4.37 of the TPHD that the NPPF requires us to “boost significantly the supply of housing” (para 47), and “deal with undersupply within the first five years of the plan period where possible” (NPPG, Paragraph: 035 Reference ID: 3-035-20140306). It then goes on to state that it does not consider this is possible in Guildford.

93. We welcome GBC’s acknowledgement in paragraph 4.39 of the TPHD that it considers that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83 and that its evidence base identifies a high level of need for market and affordable housing and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.

94. Paragraph 83 of the NPPF specifies that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

95. Paragraph 182 of the NPPF states:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities (our emphasis); and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

96. Paragraph 4.179 of the TPHD refers to the fact that the revised OAN for the Plan period is 654 x 19 years = 12,426 homes (2015-2034). GBC states that it considers that it can meet the OAN with flexibility. It states that the total potential provision of new homes across the plan period (including completions since 2015 and outstanding capacity) is 13,581. This provides 1,155 homes as a buffer. This equates to a buffer of just under 10%. This is a reduction compared to the Regulation 19 Local Plan (2016) which included a buffer of approximately 14%. GBC says this reduction is justified and does not impact the robustness of its Plan as there is now less uncertainty in relation to its ability to meet the proposed housing requirement. This is said to be due to the more realistic assumptions now being made on the strategic sites of Blackwell Farm and Gosden Hill compared to the previous Plan which was based on more optimistic delivery assumptions. The Council specifies that this is not planned over provision – rather it is built in flexibility that seeks to limit the risk of housing policies in a newly adopted Local Plan being considered out of date. It refers to the fact that the NPPF says that, “Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.” (para 49).

97. We would emphasise that the LAA is different from an allocations document, and that the identification of sites within the Assessment cannot be any guaranteed that sites with ‘potential’ will actually be delivered on the ground. As we have already referred to above, we have serious doubts regarding some of the entries in the LAA, and do not consider that their identified housing delivery rates stand up to close scrutiny.

Proposed Allocation at Farncombe

98. Paragraph 4.167 of the TPHD refers to the fact that the Green Belt and Countryside Study (GBCS) identifies a Potential Development Area (PDA) at Farncombe, located on medium sensitivity Green Belt within the AONB. In relation to the AONB, it goes on to say that the NPPF states, at paragraph 116, that planning permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated they are in the public interest. The development of the site for circa 90 dwellings is classed as major development. GBC do not consider that the benefits with providing these homes pass the considerations listed within the NPPF bullet points and which form part of the public interest assessment. We strongly disagree and believe that the Council is failing to give sufficient weight to meeting its dire need for additional housing its new Local Plan. It is also failing to identify defensible Green Belt boundaries that reflect its long-term development needs.

99. In terms of Local Plan preparation, the Guildford Borough Draft Local Plan: Strategy and Sites document (2014) set out the Council’s preferred options for growth. Our client’s site at land South of New Pond Road, Farncombe was previously identified as part of a residential allocation (number 80) within the Draft Local Plan. It was also proposed that the land be removed from the Green Belt and the Green Belt boundary re-aligned. We consider this to have been a good example of the Duty to Co-operate being put into action. Sadly, in more recent times, there appears to have been a failure to ensure that the HMA’s unmet needs are adequately addressed.

100. The 2014 Draft Plan contained the following reference:

“4.113 In accordance with national policy, Green Belt boundaries need to follow defensible lines that are easily recognisable and likely to be permanent. This includes for instance roads, railway lines, woodlands and hedgerows. We have reviewed and followed the recommendations of the GBCS with the following amendments…:

Farncombe: we have identified a development site that adjoins the settlement of Farncombe and land reserved for future development in Waverley Borough Council’s Local Plan 2002. We will continue to work together to progress this land over the plan period.”
101. Countryside Properties confirms that the land south of New Pond Road can be delivered within the first five years of
the adoption of the Guildford Borough Local Plan and contribute circa 90 dwellings to the Borough’s 5 year housing land
supply with an estimated average construction rate of about 30 dwellings per annum.

Tests of Soundness

102. In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with
national policy, as it fails to ensure that a 5 year housing land supply is provided from the start of the Plan, it also fails to
identify how the wider needs of the Housing Market Area (HMA) will be addressed, and finally its OAN fails to make
provision for all relevant housing needs. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or
‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives,
and there is doubt over its deliverability.

Summary and Conclusions

103. Any reduction in the requirement based solely on economic circumstances would appear to be ignoring wider trends
and market signals. We therefore consider the Council’s decision to reduce the housing requirement is not justified and as
such makes the policy unsound.

104. As a consequence of the necessity to bring about a step change in housing delivery rates and meet its obligations
under the Duty to Co-operate, the Council will need to ensure that it makes provision for necessary Green Belt revisions
and the allocation of sites, such as the land South of New Pond Road, Farncombe, which can deliver circa 90 dwellings,
and was identified as one of the Council’s preferred allocations in the Draft Local Plan (Regulation 18) in 2014. Given
the acknowledged fact that housing delivery will be weak in the early years of the Plan period, it will be important to
bring forward smaller and medium sized sites such as the land South of New Pond Road, Farncombe.

105. In conclusion, we would highlight the following matters

- There does not appear to the any justification for the Council seeking to reduce the length of the Plan period;
- Increased affordability issues, together with low housing delivery rates in Guildford, points to the need for
  rapid action to boost the housing by bringing forward sites lacking in constraints;
- There remains an urgent need to address unmet need within the HMA, in particular with regard to Woking;
- Annual Housing Targets seem entirely focused on ensuring that GBC maintains a 5YLS, rather than addressing
  the OAN. Indeed, they fail to even deliver the reduced level of OAN being proposed;
- As a consequence, there is over-reliance on development at the back end of the Plan period. This is dangerous
  because it does not allow sufficient time for other sites to be brought forward should delivery not occur as
  envisaged; and
- No uplift to the OAN has been made to take account of the very high affordable housing requirement that has
  been identified

Proposed Amendments

106. The following amendments are proposed:

1) The Plan should not rely from its outset upon low and unambitious Annual Housing Target figures. Instead, it
should identify a deliverable 5 year housing land supply, to which our client’s site South of New Pond Road,
Farncombe can make a contribution.

2) The Plan needs to specify how the wider unmet needs of the Housing Market Area are being addressed; and

3) The OAN needs to be increased to reflect in-migration from London, market signals and the affordable housing
demand.

[See previous comment's attachments for appendices]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1476  Respondent: 17399809 / Persimmon Homes Thames Valley (Nicola Hume)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The Guildford Local Plan is unsound as the identified housing delivery strategy is ineffective Persimmon Homes believe that the proposed housing trajectory and the process of delivery is flawed and will result in significant under-delivery of expected units. The removal of the Housing Trajectory within Policy 52 is concerning and this now places a greater emphasis on the delivery towards the end of the plan period.

This approach places a significant risk that the Plan may fail to meet its housing requirement particularly when there is an over-reliance on large sites being delivered for this period. This will leave the Council in a difficult position as there will be little time afforded to make up any shortfalls in delivery. This approach appears to be a way of the Council delaying development until as late in the plan period as possible and there can be no element of positive planning about this. The Council must consider smaller sites which are capable of delivering a sufficient quantum of development to run alongside the larger strategic sites. The Housing White Paper (HWP) has referred to the importance of including smaller sites to ensure a consistent supply is maintained. The issue of deliverability is exacerbated by the Council's inability to demonstrate a five year housing land supply.

The Council are unable to show this for the first 5 years of the plan period when it is in operation. There are severe concerns over the delivery of some of the larger sites upon which the Council are relying. The Plan proposes that smaller sites will deliver in the first five years with the larger strategic sites delivering in the 6-10 and 11-15 year periods. This back loading of the majority of development is concerning particularly when there are deliverability issues with some of the strategic sites such as Wisley Airfield. A planning application was refused for this site and an appeal to be heard later in the year. Neighbouring authorities Mole Valley and Elmbridge objected to this proposal and Highways England have previously raised concerns over the impact that this development will have on the A3 and M25 at junction 10. Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements". It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.1 years supply. Guildford therefore need to make more land available for development as without this Guildford cannot expect to be able to show a five year supply. Guildford have removed sites from this draft of the Local Plan which are in the Green Belt and considered to be sensitive. Guildford should be looking to allocate smaller sites, which are able to contribute to providing for housing delivery in order to ensure a rolling five year land supply. The NPPF at paragraph 83 states that "Green belt boundaries should only be altered in exceptional circumstances" however we would advise that the inability to show a five year land supply should be considered to be exceptional circumstances.

In terms of an approach to assessing the five year supply it appears that the Council are favouring the Liverpool method which will see the backlog delivered over the life of the plan period.

This does not accord with national policy which suggests that the Sedgefield method should be used which aims to deliver the backlog as quickly as possible and ensures that development is not delayed. In addition to this the Council propose to use 20% buffer which we would agree with given the past delivery problems. We believe that the Local Plan is unsound as the current proposed housing trajectory is ineffective and will not provide the full housing requirement over the plan period.
It is extremely disappointing that the Council have reduced their housing requirement from the 2016 iteration of the Plan to the 2017 version. Guildford's Objectively Assessed Need (OAN) has previously been identified as 693 dwellings per annum (dpa) upon which the 2016 housing requirement was set, with Guildford seeking to meet its housing needs in full. This was an extremely positive step in an area where housing needs have increased significantly and where pressure for new housing is extreme.

The 2017 version has lost some 1400 dwellings from the 2016 iteration, which equates to a reduction of 75 dpa over the plan period. This is a significant reduction and one which is not justified. The most up-to-date population projections produced by the Office for National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 people. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity and access to London and reputation as being part of the commuter belt and a desirable place to live. The OAN as calculated in the new draft Local Plan is therefore inaccurate and should be revised upwards. The 2017 addendum to the SHMA indicates that due to changing circumstances the Borough's housing need should be reduced from 693 dpa to 654 dpa. The argument for this appears to be based on economic and migration factors.

The SHMA addendum uses the 2014 household projections as the most up-to-date figures available at the time of the compiling of the evidence. These projections show a percentage increase of 1.2% from the 2012 projections used previously. The migration argument is based on both internal and international migration. The SHMA identifies that there is likely be a reduction in EU migration following the vote for the UK to leave the EU. However, as the SHMA states in paragraph 3.73 Guildford 'sees a lower proportion of EU in-migrants than was the case at a regional/ national level'.

Therefore, any reduction in EU migration is likely to have little impact on Guildford. Even if EU migration is reduced, any future trading relationships established with other countries is likely to see a requirement to allow movement of people. This therefore means that there is a likely expected increase in international migration and the impacts of this do not appear to have been sufficiently assessed. Internal migration focuses primarily on out-migration from London. At the most recent assessment, London has a substantive unmet housing need and a number of Local Authorities in London are developing Local Plans which do not appear to make concerted efforts to deal with this unmet need.

The SHMA addendum identifies that migration flows from London to Guildford have been steady since 2008/9 and there has been no increase in net flows since the end of the recessionary period which is noted as being 2012. We are concerned that paragraph 3.45 seems to dismiss any potential increase in migration from London. Whilst there still remains some uncertainty regarding migration flows over the next 10 years evidence from the GLA shows that migration patterns will move towards the levels since pre-2008.

The recovery in the economy and the availability of credit has seen an increase in home ownership and mortgage applications since 2012. Therefore it can be widely assumed that an increasing number of people are seeking to purchase homes where possible. London's affordability has decreased substantially and this will have an impact on those areas around Greater London which have access into the capital for work and leisure purposes. Guildford, with a mainline train station and proximity to the A3 and M25 is historically an area where many people re-locate to from the Greater London area. In all likelihood, it is difficult to see how over the next 10 years there will not be an increase in migration from London to areas such as Guildford.

That no provision appears to be made for this and paragraph 3.46 argues that there are no signals for a return to increasing levels of migration should be given limited weight as this is based on a single year of evidence. There is an increasing need for housing in the Borough and this is coupled with an increasing requirement for affordable housing. The 2017 addendum shows that the need for affordable housing has increased to 517 dpa from the 2015 SHMA figure of 478 dpa and this is supported by paragraph 5.32 which states that 'it is clear that house price growth has accelerated in the Borough since mid-2013'. This affordability issue has been substantially affected by the low levels of housing growth in Guildford. In seven of the past eight years, Guildford has significantly under-delivered against its housing requirements.

For the past seven years in a row the Council have delivered barely half of its annual housing requirement and this significant underperformance has enhanced levels of unaffordability in the Borough and is a strong justification as to why the Council should not be looking to further reduce its housing requirement. Paragraph 5.49 states that 'the analysis indicates that 629 dpa would be required to support the rebased SNPP ...... to support economic growth, a marginally higher level of housing provision at 631 dpa would be required'. The 2017 addendum shows an increase in household
projections, an increasing need for affordable homes and no consideration of the impacts of likely increased migration from London, suggests that insufficient uplifts have been included to account for these increases.

The decreasing affordability is exacerbated by the Council's persistent under-delivery against its housing requirement and therefore there is no justification as to why the requirement should be reduced in this Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1573  **Respondent:** 17405729 / Rowen Properties (Rowen Properties)  **Agent:** Planning and Design Group (UK) Ltd. (Andrew Grayson)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( )

**3 Land Constraints**

3.1 Policy S2: Planning for the borough – our spatial development strategy represents a central element of the Proposed Local Plan. The policy establishes the approach and spatial distribution of growth across the borough. Importantly, it also looks to balance required growth against the land designations and environmental characteristics of the area. In working to achieve this balance policy S2 adopts a sequential preference for town, appropriate village and brownfield land development.

3.2 However, the policy also recognises the that:

‘Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need’ (paragraph 4.1.8).

3.3 As such, a limited number of large strategic sites are released around the Ash and Tongham Green Belt area, through town extensions and a proposed new settlement. This is in order to help accommodate future housing need with the dual intention of preserving the rural character and landscape designations across the borough.

3.4 Specifically, the Proposed Local Plan underlines the importance of the Surrey Hills AONB, the Metropolitan Green Belt (covering around 89% of the borough), countryside designations and Thames Basin Heath SPA. Given these land constraints and the implied limits reached in and around Guildford, the borough’s principle settlement, any future housing delivery options are likely to be very restrained without beginning to undermine the principles of sustainable development.

3.5 Given the extent of land constraint across the borough, and the resulting pressure on future growth options, we consider it unreasonable that the Council has not pursued more contingency discussions through the duty to cooperate, in order to address the potential for housing under delivery and resultant unmet housing need.

**4 Housing Trajectory and Land Supply**

4.1 The Guildford Borough Land Availability Assessment: 2017 Addendum outlines the current housing trajectory and reinforces the principle that the Proposed Local Plan is dependent on a limited number of backloaded larger site releases. These are the strategic sites discussed above in relation to Policy SC2 and are relied upon to deliver against the longer-term housing need throughout the mid to latter stages of the Proposed Local Plan period.

4.2 Within a context of land restraint, these strategic sites will all require simultaneous and prompt delivery in line with projected timescales in order to successfully and consistently meet housing need. This is with little margin for slower
build out rates. Given the scale of these sites and the associated extent of infrastructure required to facilitate their
development this is considered to be a very aspirational approach to planned development and raises doubt over the
ability to meet housing need locally in the longer-term.

4.3 Adding to this, the housing trajectory is reliant on the build out of a number of approved, smaller sites across the
borough in the shorter-term. Again, we consider this approach aspirational in the context of the current 630 dwelling
shortfall in delivery since 2015, the limited 2.36 years of identified housing land supply and the operation of an additional
20% buffer to account for persistent under delivery. This is suggestive of an early under delivery of housing in the
borough which will likely be compounded throughout the period through to Local Plan adoption and, ultimately, place
greater reliance on the delivery of larger sites.

4.4 Given the apparent limitations on the long and short-term housing trajectory, in particular the reliance on backloaded
larger sites, we consider that the Council needs to act fully and promptly through the duty to cooperate process to discuss
contingency options which address any short fall in housing delivery and the resultant impact on the ability to deliver
against housing need in the borough.

5 Conclusion

5.1 As demonstrated through this representation we consider that currently the Council have not acted fully to comply
with the legal duty to cooperate. Current evidence points towards more of a technical process that fails to fully account
for contingency against existing and potential unmet housing need across the West Surrey HMA. In relation to the
borough this is particularly pertinent in light of local land constraints and a high reliance on a limited number of
backloaded strategic sites, which, in the context of current housing under delivery, will likely result in an inability to
meet housing need in the future.

5.2 We consider that it is important to resolve this issue before the adoption of a Local Plan for Guildford. As a part of
this the Council should look to speak directly with Waverley Borough Council through the duty to cooperate process
under the expectation that Waverley may need to adopt a proportion of Guildford’s unmet housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1585  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

POLICY S2: Planning for the borough - our spatial development strategy

3.4 It is clear from the wording of policy S2 that the housing requirement, in addition to the provision of employment and
retail space, has been altered to reflect the change in Plan period from 20 years to 19 years. The rationale for this change
remains unclear.

3.5 The proposed submission Local Plan removes Table 1 - Planned Delivery between 2018 and 2033, making it
impossible to understand where housing growth will come from to meet the annual housing target as set out in the policy.

3.6 Table 2 which sets out the hierarchy of retail and service centres, has also been deleted from policy S2 which further
undermines the commitment of GBC, as a fundamental principle of the Local Plan, to deliver housing in the town centre
first.
3.7 It is therefore suggested that the detail on planned delivery and settlement hierarchy is reintroduced into the final version of the plan to ensure it is clearer on where growth is coming from and the rate of delivery for the borough.

Conclusion

5.1 Guildford Vision Group remains committed to seeing the Borough of Guildford, and particularly Guildford town centre, become a better place. This requires focused attention of providing for high quality growth of housing, commercial space, together with supporting community and infrastructure assets over the next 20 years to cope with the current deficits and predicted increase in population in the borough over this period.

5.2 The historical core of Guildford is afforded a high degree of statutory protection but has a very limited mix of uses, either at present or as promoted under the Plan. The GVG Plan looks to the end of the draft plan period and the next and reimagines Guildford in providing a broad mix of higher density, mixed use development while also delivering a range of key environmental improvements. This will include improvements in retail dwell times, better leisure, business, civic, health and other provision. A more organised transport solution giving access to all forms of transport should achieve much greater modal shift. The historic core would remain protected and unchanged.

5.3 The particular focus of GVG is to see a robust and deliverable masterplan come forward for Guildford town centre which gives confidence to developers to deliver the project. Such a masterplan can achieve the objectives of the group as set out previously in this consultation response. It can meet the 17 issues as identified by GVG that are not addressed by the Local Plan in any credible way.

5.4 A vital element of any masterplan for the town centre is to resolve the existing chronic issues - traffic congestion, record vehicle-related fatalities and serious injury as well as record pollution. The congestion issues will continue to increase. If the proposed increase in homes across the borough is brought forward as set out in the draft plan then the existing failing infrastructure within the town centre will collapse completely.

5.5 GVG does not believe it can solve the traffic problem. The GVG Plan is to protect the existing accessibility and capacity of the town centre and to remove the current conflict between vehicles and people within the town centre. It employs better and safer designed roads, cycle routes and footpaths in an integrated, modal shift-enabled plan addressing the first five of the 17 issues identified by the group.

5.6 A central feature of the GVG Masterplan is the delivery of a new East-West crossing, linking York Road with Guildford Park Road. This will move traffic away from the centre. It will enable separation of cars from people and cyclists. It will make Bridge Street and Onslow St safer and free from through traffic-free, except for buses, taxis, permitted vehicles and mobility access. It will enable the lower ends of both North St and the High St to be linked together by great public space and amenities along the both sides of the riverside.

5.7 The plans suggested by GVG has genuine support from the local community, demonstrated at several public events and on social media. Unfortunately GBC have had limited engagement with the group, failed to discuss details or to answer its technical questions as a local stakeholder in the Plan making process.

5.8 It is the firm intention of GVG to have its evolving Plan considered and it will continue to make representations to the borough as part of the Local Plan examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford Vision Group Reps - final version 20.07.17 (2).pdf (1.3 MB)
I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.

I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).

I object that the amended draft does not encouraging utilising the numerous surface public car parks in to provide sustainable homes.

I object to the amended plan ignoring the government’s NPPF guidelines - “…… local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”

I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1644  Respondent: 17411649 / Hazel Jones  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

My greatest underlying concern and objection remain: that the figures for the calculation of the number of new houses required, taken from the SHMA, are seriously flawed.
Based on doubtful forecasts the initial figure has now been increased to 654 houses pa - an overall increase of 22% in building stock and double the ONS projection for the same period of 10.4%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1652  Respondent: 17412385 / Geoffrey Mayne  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on my own concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/1659  Respondent: 17412641 / Alan & Catherine Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I wish to support the letter sent in response to the draft local plan by the Burpham Community Association. I would also like to comment on the differing figures that has been added regarding the number of homes that will be required and there appears to be mistakes made in calculating these. Bearing in mind that any homes built on green belt land, by definition, around Guildford are never going to be affordable due to current land costs, so brown field site should be used first and reserved for social and affordable housing. Also I would like to have seen more support for infrastructure improvements before any development is allowed, with air pollution control oven priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

--

Comment ID: pslp171/1666  Respondent: 17413025 / Sally Novell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan and remain too high as shown by an objective assessment made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser).

2. Also in Policy S2 I object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1 and E2 there is too much emphasis on providing retail and commercial use in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

3. I object to the population growth figures in section 2.3, which have increased by almost 5000 and do not account for more recent political and economic changes.

4. I object to Policy S2 because the figures include estimated demand from London, rather than meeting the needs of residents of Guildford Borough.

5. I object to the fact that in Policy S2, the impact on the east of the borough is still disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
(a) Five-Year Housing Land Supply

Based on the housing supply trajectory in the June 2017 LAA Addendum, but applying a constant annual housing requirement of 654 dwellings throughout the plan period, the five-year housing land supply from 2016/17 would be equivalent to only 2.36 years’ requirements: i.e. less than half of the five-year requirement and a deficit of 2,470 dwellings.

The Council’s approach to ‘phasing’ the housing target in in Policy S2 arbitrarily lowers the housing target below 654 for the years between 2019/20 and 2026/27, to reflect expected problems in the provision of infrastructure needed to deliver the Council’s proposed housing allocations. This approach is not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy.

Local Plan Policy S2 is therefore evidently not sound. For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

In this case, the Land Availability Assessment (June 2017 Addendum) demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

3. Housing Needs and the Spatial Development Strategy

The Need for Housing


Past Performance

16. The following graph compares the OAN of 654 dpa with recent levels of housing completions in the Borough. The Housing Topic Paper (June 2017) notes that completions have been less than 300 dpa in all but one of the last nine years since 2008/9. [See attached for Graph 1]

17. There is clearly a challenge to raise housing completions to the level required by the SHMA and a substantial backlog of undersupply at the start of the plan period that should be met within the early years of the plan.

Updated Housing Supply Trajectory
18. A graph of the Council’s housing supply trajectory, compared with the Council’s ‘phased’ or variable housing target and information as shown in draft Policy S2 and in the June 2017 LAA addendum is reproduced below. It shows a continuing shortage of housing land supply, until at least 2024/25. [See attached for Graph 1]

19. However, this graph gives a misleading impression of the plan’s ability to deliver housing land in accordance with the SHMA’s objective assessment of housing needs (OAN) of 654 dwellings p.a., because of the ‘phasing’ of the housing requirement, in Local Plan Policy S2. The Council has arbitrarily lowered the housing target below 654 dpa between 2019/20 and 2026/27 to reflect expected problems in the provision of infrastructure needed to deliver some of its proposed housing allocations. This adjustment is not justified by the SHMA Addendum’s objective assessment of housing needs, policies of the NPPF or the guidance of the NPPG.

20. The graph below provides a more relevant and realistic picture; comparing the LAA Addendum’s housing supply trajectory with a target to achieve the SHMA Addendum’s housing requirement of 654 dpa throughout the plan period. [See attached from Graph 3]

21. This graph shows a continuing shortage of housing land until 2029/30, if the SHMA requirement of 654 dpa is applied consistently throughout the plan period. This continuing deficit for most of the plan period is concealed by the Council’s arbitrary and unjustified ‘back-end loading’ approach of ‘phased’ housing targets in draft Policy S2 which reduces the housing target below 654 dpa in every year between 2019/20 and 2026/27.

4. Five-Year Housing Land Supply

22. The housing supply trajectory also shows that the Borough has only 2.36 years’ supply of housing land available within the next 5 years against the requirement of 654 dwellings p.a. from 2015/16 in the SHMA 2017 Addendum: less than half of the 5-year requirement.

Calculation of Five-Year Housing Land Supply from the LAA Addendum, June 2017:

[See attachment for Table 1]

23. Proposals of the draft Local Plan therefore fail to comply with the NPPF because:

- they fail to meet the full, objectively-assessed needs for market and affordable housing in the housing market area;
- they fail (by a substantial margin of more than 50%) to identify a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land; and
- they fail to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; in fact, supply does not exceed the requirement of 654 dpa until the 15th year of the plan.

24. The Council suggests that housing targets should be phased towards the latter part of the plan period. Policy S2 includes the following statement (carried forward from the previous draft):

‘the delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year … is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.’

25. Paragraphs 4.1.9a and 4.1.9b state:

‘The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.'
'This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy. This will also take account of both the deficit accrued until that point and includes a 20 per cent buffer moved forward from later in the plan period. Without a rolling five-year supply of homes, relevant policies for the supply of housing would not be considered up-to-date.'

26. There is no justification for this approach in terms of the objective assessment of housing needs in the SHMA. The approach is supply led and demonstrates a failure of the spatial strategy to deliver housing sites in accordance with housing need, because of the limited range of proposed site allocations and problems with the delivery of infrastructure to serve some of the proposed allocations.

27. The Housing Topic Paper (June 2017) concedes in paragraph 4.37 that the draft plan does not ‘boost significantly the supply of housing’ as required by paragraph 47 of the NPPF and does not ‘deal with undersupply within the first five years of the plan period…’ as required by paragraph 035 of the NPPG.

5. The Council’s Spatial Strategy

28. The Council’s spatial strategy relies on a limited number of strategic sites where there are significant requirements for infrastructure that cannot be provided in step with housing requirements. It is a consequence of the Council’s reluctance to review Green Belt boundaries and to allocate sites on the edges of the urban areas which could be implemented earlier in the plan period.

29. The need to demonstrate a rolling five-year supply of housing is no justification for this approach to phasing as argued in paragraph 4.1.9b. Housing land supply should be measured against housing requirements and there is no justification in the SHMA for a phased supply of housing that increases towards the end of the plan period and remains below housing requirements for more than half of the plan period.

30. Measured against housing requirements, the Council is not able to demonstrate a five-year supply of housing land until the latter part of the plan period, even on the basis of the housing supply trajectory in the Land Availability Assessment, which is said (in paragraph 4.1.9a) to include higher figures than the local plan targets. To plan for housing provision that is below requirements for most of the plan period is clearly inconsistent with the policies of the NPPF and the advice of the NPPG (contrary to what the Council says in paragraph 4.1.10).

31. The Housing Topic Report (June 2017) admits in paragraph 4.189:

‘Whilst we are continuing to explore whether neighbouring authorities are able to help contribute towards our early supply, it is unlikely that this backlog will be capable of being met in the first five years of the plan as required by the NPPG without significant harm to the Green Belt, and other harm as identified in this topic paper. We consider this is justified on the basis of the significant level of infrastructure that is required to be delivered in order to ensure that development across the borough is sustainable. This is further exacerbated by the reliance on a number of strategic sites which by their very nature take longer to deliver’.

32. We also note that the Council no longer claims that the proposed increase in new homes would be in line with their Economic Strategy.

33. Changes in spatial strategy are therefore required to provide a planned supply of housing land that matches requirements over the whole of the plan period, including the allocation of sustainable sites that are not dependent on major infrastructure investment and can be developed early in the plan period. Meeting the Borough’s housing requirements will need the allocation of a wider range of sites, including small and medium-sized sites, in a range of sustainable locations that include some sites that are currently in the Green Belt on the edges of the urban areas, where modification of Green Belt boundaries will be necessary.

34. The shortage of housing land supply that would result from policies and proposals of the draft Local Plan constitute the ‘exceptional circumstances’ (NPPF paragraph 83) that would justify the alteration of Green Belt boundaries in the Local Plan.

35. These problems of housing land supply are not overcome by the Council’s approach to phasing in Local Plan Policy S2, by which the planned delivery of housing is deferred until later in the plan period. As noted above, this approach is
not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy. Local Plan Policy S2 is evidently not sound.

36. For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

37. In this case, the Land Availability Assessment demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances.

38. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

6. Conclusions

39. The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’

40. The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

41. The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound.

42. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Graphs.pdf (199 KB)
I dispute the revised OAN figure in the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 because the analysis of the demographic and economic need figures produced by GL Hearn (GLH) on which it is based is fundamentally flawed.

I have read the review by NM Strategic Solutions Ltd (NMSS) of the Addendum Report as well as the original SHMA which can be found on Guildford Residents’ Association’s website. NMSS have identified a number of serious defects in GLH’s Report which completely undermines the reliability of the OAN. For example, GLH seriously over-estimated the population growth for Guildford by over-estimating student net migration into Guildford. If proper adjustment is made for the outflow of students in the period 2001-15, NMSS calculated that this would reduce the demographically-based estimate of the number of homes needed for the period 2015-34 from 558 to 404 pa based on student figures alone. It should also be noted that Inspector examining Waverley BC’s draft Local Plan accepted NMSS’s demographic analysis as opposed to that of GLH. Even the Office for National Statistics has conceded that there is a problem with their existing statistics for Guildford that needs to be addressed.

Furthermore, NMSS also demonstrated the OAN is based on GLH’s flawed estimate of the number of homes needed to support economic growth.

Like many others, I consider the shortcomings in GLH’s Reports do not entitle GBC to depend on the OAN to support its target figure of 12,426 new homes during the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1794  Respondent: 17419841 / Andrea Fairbairn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (Verified by professional analyst Neil MacDonald of NMSS who concluded than an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/7485  Respondent: 17424705 / Keith Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Re: Local Plan Consultation - Send Village, Garlicks Arch, Send Hill, Clockbarn Nursery

I am writing to object to the proposals for the above developments

[...]

Traffic issues

The SA states that ‘adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use include recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, localised air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.’ This is very much the case in the above proposed developments. Traffic queues at peak times through Ripley and Send villages and the increased expectation of traffic from the proposed developments is not sustainable.

An objective of the SA was to ‘achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)’. There are no plans mentioned for providing the means of sustainable forms of transport from the above mentioned developments. Guildford residents use cars and these proposals only increase the likelihood of more cars on our roads.

Furthermore the Department for Transport’s Road Investment Strategy includes schemes for the A3 in Guildford and the M25 Junction 10/A3 Wisley interchange; Also, it says that interim ‘quick win’ schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period. But ‘some’ relief does not commit to assuring residents that any work will be undertaken in this area.

The SA states that the delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3. When will we know about this and is the Guildford plan being held back until such information is confirmed? No statement is included to this effect.

The SA notes that another important consideration is the potential for increased traffic to impact on historic character within Conservation Areas; It states that it is difficult to draw strong conclusions in the absence of detailed modelling work. Should this not be a pre-cursor to any plan? An issue of particular importance it notes is that there is likely to be an increase in traffic through the Ripley Green and Ockham Conservation Areas (the former being associated with a high concentration of listed buildings)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1877  Respondent: 17424801 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

- Policy S2 - The 12,426 (654 per year) number of homes that the Plan intends to deliver over the 19 year period 2015-2034.

Although the target for housing has now been reduced from 693 to 654 per year, it is still far too high and fails to take account of the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.
I therefore object to the calculation of assessed need for housing and other development in the area and the grossly disproportionate impact of the Local Plan’s proposals on its more northerly communities of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2778</th>
<th>Respondent: 17425377 / Hannah Finning</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, <strong>is Sound? ( )</strong>, <strong>is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Policies A27, A28 and A29- These policies are not coherent and provide no provision for community. This is both the definition of boundaries between the villages, public spaces and infrastructure. It's disappointing that the plan has nothing for local people but is trying to cover this land in houses leaving us nothing. You have to make it a nice place to live.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1909</th>
<th>Respondent: 17426113 / Home Builders Federation (Mark Behrendt)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</strong>, <strong>is Sound? ( No )</strong>, <strong>is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- The reduction in the housing requirement is unsound because it is not justified.

We are disappointed that the Council has looked to reduce its overall housing requirement by 1400 dwellings in this latest iteration of its plan. The 2017 addendum to the SHMA now indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa.

The consideration of economic factors within any SHMA is to ensure that there is sufficient housing to support the employment growth scenarios set out in the Plan. However, if economic growth is not expected to be as strong as first thought this does not necessarily mean the Council should reduce its housing requirement. Firstly, there is an inherent uncertainty in employment forecasts and as such the NPPG does not require a mechanistic matching of labour supply and planned housing provision. Consideration needs to be given to the level of job growth elsewhere in the HMA, other neighbouring areas and whether it creates unsustainable commuting patterns. However, it would appear that such considerations have not taken place. The study only examines economic growth scenarios for Guildford and does not consider the implications for the rest of the HMA or, indeed, whether lower growth forecasts are applicable across the HMA. As Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across the HMA, the approach taken by Guildford is not consistent with national policy.

Whilst the Council argues that the economic circumstances show a reduced need for housing, the demographic baseline and affordability issues paint a different picture with regarding housing needs. The baseline level of housing need in the Borough, presented in the 2017 addendum, has risen from 517 dpa to 577 dpa. It must also be remembered that the highest demographic projection using the 10 year migration is 584 dpa.
There is clearly an increasing need for housing within the Borough. The 2017 addendum shows the need for affordable housing has increased from 478 dpa to 517 dpa alongside continued house price inflation of 7.5% per annum over the last 5 years. Indeed, the 2017 addendum highlights this issues in paragraph 5.32 stating that:

“It is clear that house price growth has accelerated in the Borough since mid-2013”

The low levels of housing growth in the Borough, coupled with increasing demand and restricted wage inflation, have contributed to making the Borough unaffordable for many of its residents. As highlighted earlier, over the last five years house price inflation has been at 7.5% yet wage growth over the same period has been slightly less than 1%[1]. Looking over the longer term, average wage growth over the last 15 years has been just over 2% yet house price growth has been 4%. This worsening scenario has led to the situation identified in paragraph 5.27 of the 2017 addendum which indicates that lower quartile house prices are 11.5 times the lower quartile earnings in the Borough. These market signals would suggest the need for a more significant uplift on the latest demographic baseline of 577 dpa rather than the reduction that is being proposed by the Council.

As we stated in our response to the 2016 draft Local Plan, the NPPG sets out the local authorities’ need to consider how past performance will impact on household projections. The 2017 addendum to the SHMA continues to show that the number of households being formed by those between 25 and 34 have reduced. There are clear affordability pressures reducing household formation in this age bracket but poor delivery has compounded this situation. The table below shows that the Council has consistently underperformed against both its South-East Plan target of 422 dpa and its latest assessment of housing need. This underperformance again indicates that the Council should not be looking to reduce its housing requirement in the manner proposed.

[See appendices for Table 1]

Finally, given the growth expectations of London, we are concerned that the addendum dismisses, in paragraph 3.45, any potential increase in migration from London. Whilst we accept there is uncertainty regarding the future dynamics of population flows between Guildford and London, the evidence from the GLA suggest that migration patterns will move towards the rates seen prior to 2008 and the subsequent recession. This would suggest that areas around the Capital, such as Guildford, will see increasing levels of housing need rather than stabilise at current levels. The addendum, at paragraph 3.46, argues that there are no signals that a return is likely since the recovery in 2012. Given that this assumption is based on a single year of evidence we believe limited weight can be attributed to such an argument.

Any reduction in the requirement based solely on economic circumstances would appear to be ignoring wider trends and market signals. We therefore consider the Council’s decision to reduce the housing requirement is not justified and as such makes the policy unsound.

If the Council is to amend its housing requirement on the basis of this evidence (something that should be questioned given that it creates inconsistency in needs assessment across the HMA), then it must consider the evidence as a whole. We would suggest that, as a minimum, the London migration sensitivity analysis should be applied to the latest baseline of 577 dpa. It would then be appropriate to apply a minimum uplift of 20% to this adjusted baseline to take account of the severe affordability issues facing Guildford.

**Five-year land supply and housing trajectory**

The Plan is unsound as it is ineffective

Firstly, the new paragraph 4.1.9a states that the figures in the Annual Housing Target table sum to 12,426 homes. This statement is not true. The figures sum to 9,810. To sum to 12,426 the target of 654 dpa must be included for the first four years of the Plan period. Whilst this is recognised in the 2017 Addendum to the Land Availability Assessment (LAA) the Council must be clear in the policy and supporting test to ensure that the deficit accrued during this period is properly considered.

We are concerned that the Council has amended the Annual Housing Targets in Policy S1. This now places even greater emphasis on delivery towards the end of the Plan period. This was a concern highlighted in our previous representation. Such an approach means there is a higher risk of the plan failing to meet its housing requirement should any of the major sites being relied on not deliver to schedule. Should this happen it also leaves less time for the Council to address such...
shortfalls in delivery through its contingency plans. The use of the trajectory in this way appears to be an attempt by the Council to delay delivery and not seek to meet need earlier in the plan. The Council must identify a wider range of sites and in particular smaller sites. The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply and we would support the Government’s proposal in the HWP that 10% of all housing allocated should be on sites of less than 0.5ha.

Our concerns regarding the deliverability of the plan are exacerbated given the fact that the Council cannot show a sufficient supply of land for the first 5 years that the plan will be in operation. In the Housing Topic Paper the Council have not stated whether they propose to use the Sedgefield or Liverpool approach to assessing five year supply. However, given the statement in paragraph 4.188 it would appear that the Council will be looking to address backlog over the full plan period (The Liverpool method). This is not the approach favoured in the NPPG. As we stated in our previous assessment, there seems to be little reason why bringing forward allocated sites earlier would create any additional harm.

We would therefore propose that, in accordance with national policy, the Sedgefield method is used to ensure that the backlog is delivered as quickly as possible and not ‘put off’ until later in the plan. We would agree with the Council’s application of the 20% buffer to take account of the persistent under delivery of housing in the Borough.

Applying the Sedgefield methodology from a base of 2019/20 means that the Council will need to address a backlog of 1,319 dwellings between 2019/20 and 2023/24. Based on the trajectory in policy S2 they would need to deliver a total of 3,719 dwellings during that period. As outlined above, and in order to take account of persistent under supply, a 20% buffer would need to be applied. This requires the Council having to identify land to deliver 4,463 new homes in total during this period. The 2017 Addendum to the LAA identifies sufficient supply to deliver 3,582, some 881 homes fewer than required. Even if a 5% buffer were applied (which neither we nor the Council support), there would still be a shortfall of 323 dwellings. This is set out in the table below.

[See appendices for Table 2]

Therefore, when using the Sedgefield methodology even a trajectory skewed towards the later part of the Plan, is not sufficient for the Council to show sufficient supply to meet its requirements during the first five years of the plan. This scenario calls into doubt the effectiveness of the Plan and that, in accordance with paragraph 49 of the NPPF, policy S2 could be considered out of date from the point at which the plan is adopted. As such we believe the plan is unsound as it is not consistent with national policy and nor is it effective as there are serious doubts as to whether it is deliverable over the plan period.

[1] ONS Annual Survey of hours and earnings (NOMIS – June 2017)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Tables.pdf (8 KB)
1. I object to the fact that in Policy S2, despite the aforementioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in other areas such as Normandy/Flexford with the East of the borough taking a disproportionate and even increased share.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2115  Respondent: 17445153 / Gillian Brierle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Although GBC has reduced the number of houses from 693 to 643 per annum there is no information forthcoming, and therefore not the necessary transparency, about how this figure has been reached or why it does not agree with the figure of 404 homes p.annum in the independent analysis of the SHMA which was carried out by a respected national expert who worked for the government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2120  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

4:1:9

Albury Parish Council objects to the proposed development at Gosden Hill Farm and former Wisley airfield as specified in our objection to point 3:1 above.

Page 30 4:1:9a

It is disappointing to see that the delivery of necessary infrastructure to support new housing is not expected to occur until towards the end of the planned period in 2033/34. Albury Parish cannot sustain increased traffic volumes caused by new housing and business in the Borough as recommended in the Plan. Infrastructure improvements must be completed in line with development. Most homes have at least 2 cars which will bring an additional 24,852 cars onto the Borough’s roads. The Plan contains no improvements to roads, (particularly the A248), buses or cycle routes through Albury Parish and any that were made would have to be in place before new homes were occupied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2144  Respondent: 17445441 / Helen Patterson  Agent:
I am very disappointed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan.

I believe that the new evidence submitted is flawed and that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2290  Respondent: 17447329 / Justin Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I must illustrate the additional impact on other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2389  Respondent: 17459073 / Peveril Securities (Sir or Madam)  Agent: WYG (Simon Chadwick)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I would like to thank you for the opportunity to comment on the ‘Proposed Submission Local Plan’. WYG is appointed by Sladen Estates and Peveril Securities, who have interests in the former Walnut Tree Park and adjacent Nissan car showroom sites in Guildford, to make representations. A location plan showing the extent of the site is enclosed for ease of reference.

The site was not allocated in the ‘Proposed Submission Local Plan: Strategy and Sites’ document published in June 2016, as confirmed in an email discussion with the Planning Policy Team at the time. There is no reference to the site in the 2017 ‘Summary of Key Changes’ document, neither is it highlighted as a change on the revised Guildford Urban Area Plan.
maps. Despite this, on some (not all) of the Guildford Urban Area and Guildford Town Centre maps, the site now appears to be allocated as a ‘Strategic Employment Site (Light Industry, Industry and Storage and Distribution)’.

The proposed allocation of this site for B2/B8 uses appears to be an error. The site is in an area where several residential developments have taken place in recent years and lies adjacent to sites allocated for further high density residential development (Local Plan site refs. A13 and A14). The appraisal for site ref. A14 in the Council’s Land Availability Assessment 2016 states “With the changing nature of Walnut Tree Close the current B8 use may be unsuitable in a residential area”. Our clients’ site lies immediately adjacent to site ref. A13, therefore we do not consider it to be suitable for new B2/B8 development either. The Nissan site itself was assessed in the 2014 Strategic Housing Land Availability Assessment (SHLAA) where it was earmarked for residential, offices or a mix of both – with no reference to B2 or B8 uses.

The site does have an implemented planning consent for B1 development (permission ref. 12/P/00528). However, the site has been marketed both to let and for sale for more than two years without any serious leads from potential occupiers. This exceeds the required two years of marketing proposed in emerging Local Plan Policy E3 before employment sites can be considered for alternative uses. In addition, our clients also sought to amend the design of the office scheme to improve its appeal to a wider market (permission ref. 15/P/00306) but without success. Whether it is the Council’s intention in the Proposed Submission Local Plan to allocate the site for B2/B8 or B1, the allocation of this site for employment uses would be contrary to NPPF paragraph 22 which seeks to prevent longterm protection of employment sites where there is no reasonable prospect of the site being used for that purpose. The allocation for housing would help the Council meet its Objectively Assessed Need for housing in a way that would minimise the requirement for Green Belt release. The provision of housing on this site should therefore be reasonably welcomed.

Our clients had pre-application discussions with the Council’s Development Control Team in March to bring forward housing on the site. In terms of availability, the majority of the site has already been cleared and there is a realistic prospect that the development will be delivered in the next five years. The site is likely to be attractive to the housing market, given the close access to Guildford railway station and Guildford Town Centre, and the changing nature of the area towards residential uses. The scale of development that could be accommodated on this brownfield site, subject to achieving a satisfactory design, would make a significant contribution towards the Council’s housing target and is in a more sustainable location than some of the proposed housing allocations in the new Local Plan.

In summary, it is unclear whether the allocation of this site for B2/B8 uses has been made in error. Notwithstanding, the use of the site for site for B2/B8 development is not considered to be compatible with the increasing number of residential units by being built near to the site. Despite our clients’ concerted efforts to deliver office development on the site, there have been no offers from businesses to occupy the site. Subject to appropriate design, this site is well suited to residential development and the Council has already recognised the suitability of this part of Guildford for residential development by allocating housing sites in the local area.

If the allocation of this site is an error, we respectfully ask that this allocation be deleted as there is no justification for the allocation. We would also ask officers to carefully consider the allocation of the site for residential, which fully supports with the Council’s desire to make use of previously developed land within urban areas for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17/2422</th>
<th>Respondent:</th>
<th>17460673 / Rushmoor Borough Council (Anna Ludford)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>
Please find our response to the Guildford Proposed Submission Local Plan consultation below. This response has been agreed by Councillor Martin Tennant, the Portfolio Holder for Environment and Service Delivery.

Rushmoor Borough Council provided a detailed response to the Guildford Borough Proposed Submission Local Plan: strategy and sites document of 2016. The Council recognises that this current stage is a focussed consultation on the changes being proposed to the Plan prior to submission, and Rushmoor Borough Council has not identified any proposed changes that would require further detailed comments.

However, the Council is mindful of the discussions which took place at the recent Waverley Local Plan Examination Hearings relating to unmet need in the West Surrey Housing Market Area (HMA). Therefore, the Council would like to take the opportunity to clarify our position.

The Hart, Rushmoor and Surrey Heath (HRSH) SHMA (2016) identifies a housing need of 1,200 homes per annum across the HMA between 2014 and 2032. Of these, 436 homes per annum are identified as being required within Rushmoor, which equates to a total need of 7,850 dwellings to be provided in the Borough over the Plan period (2014 to 2032).

In assessing whether this need can be met, given the tightly constrained urban nature of the Borough, the Council has sought to maximise the use of town centre sites, both to enable housing delivery and to support town centre regeneration objectives. This included developing a more challenging understanding of site capacities. The Council has also explored opportunities for the further release of employment sites, having regard to the need to provide a reasonable balance between employment and housing, and ensure that there is sufficient supply of employment sites to meet the economic needs of the Functional Economic Area and of the Enterprise M3 LEP area. This further work was undertaken through the preparation of the SHELAA (2017), which identified that the Council is in a position to meet the OAHN for Rushmoor set out in the latest version of SHMA (2016).

In terms of meeting wider housing needs, the Council has continued to cooperate with authorities outside the Hart, Rushmoor and Surrey Heath HMA to raise awareness about the constrained nature of the Borough. Whilst we have been responsive to discussions on the issue, the evidence in the SHELAA confirms that the Council is not in a position to assist other authorities or HMAs in meeting any shortfall they may be expecting or have in meeting their identified OAHN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2430</th>
<th>Respondent:</th>
<th>17461921 / Linden Homes South</th>
<th>Agent:</th>
<th>Turley (David Murray Cox)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

These representations raise the following concerns with regards to Policy S2:

- The identified housing needs of Guildford Borough;
- The provision of housing for the unmet needs of neighbouring authorities;
- The phasing of development as set out in the Annual Housing Target table;

The identified housing needs of Guildford Borough

The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.
The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part 1 Inspector has applied an uplift of 25%.

The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

The provision of housing for the unmet needs of neighbouring authorities
At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities within the same Housing Market Area (for example Waverley and Woking Boroughs).

We understand that Woking Borough is continuing to plan on the basis of its Core Strategy requirement (292 dwellings per annum to 2027, in comparison to the OAN identified in the West Surrey SHMA 2015 of 517 dwellings per annum between 2013 - 2033) (therefore 225 dwellings fewer). The Waverley Local Plan Part 1 was originally prepared on the basis of meeting an OAN of 519 dwellings per annum; the Inspector’s consideration during the Examination has revealed that provision should be made for an OAN of at least 590 dwellings per annum. Furthermore, we understand the Waverley Local Plan Part 1 Inspector has concluded that provision should be made for a proportion of Woking’s unmet need within Waverley and Guildford Boroughs and that the Inspector settled on a figure of 83 dwellings per annum as being equivalent to half of Woking’s unmet need.

It is essential that consideration is given to how the unmet needs of Woking are to be provided for. A failure to make provision for this level of housing development would result in a shortfall of 225 dwellings per annum.
In addition, we consider that the Guildford Borough Local Plan should be prepared on the basis helping to provide for other authorities should the need arise.

The Council’s proposal to designate a large part of the Borough as Green Belt further restricts the ability to cater for unmet housing needs arising from within the HMA.

**The phasing of development as set out in the Annual Housing Target table**

We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2026/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequently this raises concerns over whether any accrued shortfalls can be resolved.

If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

We do not consider that paragraphs 4.1.9a and 4.1.9b or the Housing Topic Paper justifies the Council’s phased approach to the delivery of housing during the Plan period. The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear...
need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered.

Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

We note that paragraph 4.1.9a of the Proposed Submission Local Plan states:

“This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

There are various considerations that need to be addressed in regards to the Proposed Submission Local Plan and the level of unmet housing need, in particular the Council’s inability to demonstrate a five year housing supply and the strategy for delivering housing within the Proposed Submission Local Plan. In particular, with the five year supply shortage and an expected shortfall of sites within the early years of the Local Plan, the Council’s housing supply position can only be expected to worsen. Furthermore the Council’s reliance on strategic sites, in the latter half of the plan period could lead to longer term shortfalls or delays in housing supply if those sites fail to deliver at the rate expected.

The housing supply shortfall and the Council’s reliance on large sites (delivering at the end of the Plan period) reinforces our view that the Council should seek to utilise a greater range of sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2581</th>
<th>Respondent:</th>
<th>17463841 / The Earl of Onslow and the Trustees of the Clandon Estate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>WYG Planning (Sarah Evans)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( No ), is Legally Compliant?</td>
<td>( )</td>
</tr>
</tbody>
</table>

**Housing Numbers: Policy SP2 & Spatial Vision**

2.3 The changes made to the overall housing needs for the period to 2034 (changed from 2033) (a reduction from 13,860 to 12,426) is not justified and in fact the housing needs number should have been increased not decreased.

2.4 The revised OAN evidence base is not therefore, considered sound or justified and the resulting plan provision will not be compliant with the NPPF, the Local Plan will not be sound or effective and will not meet the needs of the Borough.

2.5 The first point to note is that the period has been extended to 2034 and therefore the number of homes required should include both the additional year’s need of housing and the deficit in housing built up in 2014 and 2015 which has accrued as a result of the delay.
2.6 Second, the population assumptions prepared by ONS have not changed since the previous iteration of the Local Plan. Indeed, statistics released since July 2016 point to an acceleration in the population with actual populations exceeding the 2014 forecasts. Therefore, prima facie, the housing need should have been amended upwards.

2.7 Third, the plan does not deal specifically with the on-going shortfall of houses that have not been built in recent years and which should have been included in the calculation of the housing needs. It is of course imperative that this shortfall is addressed at the outset of the period, using the Sedgefield method, placing great urgency on identifying sites which can be delivered promptly. The proposed changes to the Plan do not identify such sites or deal with this problem.

2.8 This problem is illustrated in the housing trajectory proposed at Policy S2. Even with the lower commitment to house-building as proposed through the changes, the housing trajectory shows that the proposed level of house-building would not meet an annualised supply until 13 years into the 19 year plan period. In practice, this means that for at least the two thirds of the plan period, the house building will not meet the needs of the population. This consideration of annualised need does not take into account the need to deliver homes faster to meet previous deficits or the higher levels of ONS projections within the first half of the plan period, which further compound the need not to delay the building of homes. This undersupply caused by the slow rate of infrastructure delivery associated with major sites indicates that greater effort should be directed towards delivering sites that can contribute to supply in the early years of the plan, such as Onslow Park.

2.9 Fourth, although the Housing White Paper published earlier this year is yet to be incorporated into legislation, it would have seemed sensible for Guildford to have given consideration to it prior to publishing this draft local plan. It is clear that the increased housing stock that central government wishes to see built will impact on councils such as Guildford who will need to increase the number of homes to be built significantly.

2.10 Fifth, it is noted that the plan makes no allowance for meeting housing needs from elsewhere in Surrey. This is a significant factor in the HMA and merits further consideration as the unmet needs within the HMA are potentially cumulative and material.

2.11 The updated evidence base includes economic assessment which projects economic growth will not be as strong as previously predicted. We contest this assessment which does not consider growth elsewhere within the housing market area, and the conclusion to plan for less homes because of economic uncertainty. The plan embarks on this unsound strategy, to plan for less homes, just in case the economy is not as prosperous as previously projected. Instead, the borough should be proactively planning to meet its needs.

2.12 The assessment of environmental constraints hasn’t been properly undertaken in the context of the proposed modifications. A larger amount of Green Belt land can be released than Plan intends to. The plan fails to release Green Belt for sites to be delivered early in the plan period, as well as towards the end of the period and beyond. We recognise the aspiration to deliver strategic infrastructure in the borough to serve development within and outside the borough, but this does not negate the responsibility or the need to plan for homes in the early part of the plan period.

2.13 It is interesting to note that Mid Sussex’s local plan has recently been subject to a review by the Inspectors appointed by the Secretary of State. Whilst it is accepted that no two boroughs are identical and that different factors determine the appropriate numbers of new homes that are required to be built, there are interesting similarities between Guildford and Mid Sussex which suggest strongly that this iteration of the Local Plan materially understates the housing needs of the borough of Guildford. To expand:

- Mid Sussex actual population 2014: 144,000
- Guildford population actual population 2014: 143,000
- Mid Sussex population forecast 2034: 169,000
- Guildford population forecast 2034: 167,000
- Population increase 2014 to 2034 (Mid Sussex.) 25,000 being 17%
- Population increase 2014 to 2034 (Guildford) 24,000 being 17%

2.14 In conclusion, although the plan has been improved, there is still a significant degree of risk that it will not meet the needs of the population. This is especially the case in the initial years of the plan period. The plan should be revised to ensure that homes are delivered promptly to meet the needs of the population.
2.14 Other key factors such as current housing stock, housing shortfall, net migration, births, deaths, affordability, shortfalls from adjoining boroughs, including Woking, and economic factors are considered to be broadly similar.

2.15 At the hearings in early 2016, the Inspector at Mid Sussex decided that the Council’s proposed number (700 new dwellings per year) was insufficient and determined that 1,026 new dwellings were required. There are also lessons to be learned from the Local Plan examination in Waverley, which also clearly suggest that housing needs must be met. The Inspector for Waverley concluded that Woking’s unmet needs should be met within the HMA (including both Waverley and Guildford), and suggested that Waverley should look to plan for an additional 150 dwellings per year.

2.16 It seems highly likely that similar conclusions will be drawn by an Inspector when assessing the housing needs for Guildford and that the number of new homes required will be increased significantly. It is also likely that the Inspector will wish to see the homes being delivered in the early part of the plan (when population growth is at its most rapid) to meet the genuine needs of the area and not store problems for the future and will therefore, want to ensure that the issue of housing need and affordability is properly addressed.

Timing of Housebuilding: Policy S2

2.17 The Office of National Statistics shows that the anticipated population growth in the Guildford Borough will be quickest in the early period of the review and yet the local plan has incorrectly back ended the delivery of the homes. A situation which has been exacerbated by the changes in the plan.

2.18 The first point to note is that the Local Plan assumes a linear increase in population from 2015 to 2034. In fact, the population is forecast to grow quickest at the beginning of the period under review (with over 50% of the increase anticipated by 2022). Source: ONS 2014 based subnational population projections.

2.19 It would therefore be most appropriate if the delivery of houses was planned to be higher in the early years of the plan period. Unfortunately, the proposed amendments to the plan fail to take account of this, and indeed the Local Plan states that the number of houses to be built in the early years of the plan (given this choice of strategic sites) will be less than the number built towards the end of the plan.

2.20 This problem of delivery of homes in the early years of the Plan arises as a result of the Plan incorrectly relying for its delivery of homes on a small number of large sites, some in unsustainable locations, that in themselves require significant up-front infrastructure investment and delivery.

2.21 There is no need for this shortfall in the early years to be the case. For instance, as has been confirmed by our earlier representations, Onslow Park can complement the strategy of the Local Plan which focuses development around Guildford as the primary town, and boost early years’ supply as a result of the ability for the Onslow Park site, to be developed much more quickly than the other proposed sites and deliver significant housing numbers and social infrastructure in the early years of the plan. Sites which adjoin the urban area and benefit and contribute to the services and facilities of the town are inherently more sustainable, deliver greater accessibility and public benefit and are easier served.

2.22 To compound the problem, it seems almost certain that even if some of the problems (particularly with regards to infrastructure and viability) that affect the largest sites included in the draft plan can be resolved, development of these sites will almost certainly be towards the end of the Plan period under review. This is acknowledged to some degree in the consultation which notes that certain sites deliver some of the identified homes beyond the plan period.

2.23 If reference is made to sites A24, A25, A26, A29, A35 there is no confirmation that any of these homes (together totalling 7,950 of the proposed homes and representing 64% of the total housing envisaged for the period) can be built before 2022. Indeed, it is stated that they will be built “during the plan period” and only after the infrastructure identified in Appendix C has been completed.

2.24 The allocation of Onslow Park could therefore both (i) provide the delivery of houses in the early years of the plan and thereby correct the problem with the existing plan that has a shortfall in the early years and (ii) help the delivery of infrastructure to Guildford (such as the extending the existing park and ride on site) which would complement the social and other infrastructures to be provided by the other urban extensions to Guildford.
New Housing Projections: Policy S2

2.25 Actual growth in population in Guildford (last release by ONS 22 June 2017) is in excess of the forecast ONS 2014 sub national predictions which are the basis of the calculation of the housing numbers, with the actual 2016 population being 148,020 compared to a forecast of 147,400, implying that the housing needs number (particularly in the early years) should have been increased upwards, not downwards.

2.26 It should be noted the ONS has just released new figures (in June 2017) that include their estimates for the change in the population of Guildford for the period June 2015 to June 2016. This shows in the 12-month period the population grew from 146,080 (June 2015) to 148,020 (June 2016). This increase (of 1.3%) is considerably higher than the forecast figures previously produced in 2015 and on which the Local Plan has been based.

2.27 The ONS 2014 sub-national population projections predicted that the mid 2016 population of Guildford would be 147,400. The actual 2016 figure of 148,020 therefore shows the population has grown by 620 more than forecast within a two-year period. This is a significant overshoot within a very short order.

2.28 Although these recently published statistics were not available when the targeted changes to the Local Plan were prepared they need to be given proper emphasis now for two reasons: First, this actual (not projected) increase requires a significant increase in the number of houses which are needed to be built now and in the early years of the plan; and it seems there is a trend of population growth in Guildford continually exceeding projections. It therefore seems likely that (at least in the next few years) the actual increases in population will continue to exceed the projections resulting in an ongoing requirement for more houses.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724_Onslow_Park_Reps__targeted_consultation_on_LP_with_app_Redacted.pdf (2.4 MB)

ONSLOW PARK

1.4 It was our expectation that the Council, after assessing our representations, would concur that Onslow Park was a suitable and sustainable site, particularly bearing in mind the material issues associated with the other sites identified, and that consequently Onslow Park would be included in the Guildford Borough Proposed Submission Local Plan: strategy and sites (2017).

1.5 The Earl of Onslow and the trustees of the Onslow Estate are therefore disappointed that this was not the case and would like to explain further in this representation letter why they have concerns that the changes now proposed to the Local Plan are not appropriate changes in the context of the relevant policies and other material considerations.

1.6 Furthermore, the Earl of Onslow and the Trustees of the Onslow Estate would like to re-iterate their willingness to engage with Guildford Borough Council to make the Onslow Park site available for development if it transpires that further revisions are required to be made to the Local Plan before it is finally adopted.
1.7 We would note that the following should be taken as objections to the amendments made to policies S1 and S2, including the Spatial Vision, which in terms of both the level of housing proposed and the spatial strategy adopted fails to meet the needs of the Borough or promote a sustainable spatial strategy that minimises the need to travel (particularly by car) and the impact on climate change.

1.8 We would also note that the detailed changes to paragraph 4.1.8 maintain the failure to place emphasis on sustainable urban extensions as being inherently more sustainable than development in smaller villages or the promotion of new or expanded settlements and hence also constitute an objection to the nature and extent of changes proposed.

2.1 As described in the introduction, and in compliance with your request that representations focus on the changes made from the 2016 draft plan to the 2017 revised draft, we wish to make the following representations:

• The changes made to the overall housing needs for the period to 2034 (changed from 2033), being a reduction from 13,860 to 12,426, is not justified and in fact the housing needs number should have been increased not decreased to reflect the true level of housing need within the Borough.

• The Office for National Statistics project that the anticipated population growth in the Guildford borough will be quickest in the early period of the review, and yet the emerging Local Plan proposes, incorrectly, to back end the delivery of homes. The later delivery of homes has been exacerbated by the proposed changes to the Plan.

• Actual population growth in Guildford (last release by ONS 22 June 2017) has surpassed the forecast ONS 2014 sub national predictions, which are the basis of the calculation of the housing numbers, with the actual 2016 population being 148,020 compared to a forecast of 147,400, implying that the housing needs number (particularly in the early years) should have been revised upwards, not downwards. The evidence base has not been updated to take account of the two latest sets of population estimates released by ONS, and as such is outdated.

• The changes made to the Infrastructure Schedule (Appendix C) cast significant doubts on the deliverability and viability of both the Local Plan itself and the large allocated sites (which account for 64% of the anticipated housing supply).

• Furthermore, the changes to the Infrastructure Schedule (Appendix C) show that it is proposed Highways England will fund several projects (with a possible cost per appendix C of up to £755 million). Highways England have as of today only approved to fund one of the projects and it seems unlikely they will be able to fund the other projects given the quantum requested and the funds available to Highways England.

• The allocation of a number of sites has the effect of requiring the provision of significant and costly infrastructure necessary to support these sites which demonstrates the unsustainable spatial strategy of this draft of the local plan. Much of the cost of this infrastructure will be met from the public purse. A more sustainable spatial strategy focused on Guildford would require much less costly infrastructure, saving public funds and allowing further investment in the town that would be of wider public benefit.

• The changes made to the strategic site allocations are inappropriate as they include sites which do not meet important criteria which should be considered in determining appropriate sites. We contend that proper and balanced consideration should have resulted in the allocation of Onslow Park in the Plan.

2.2 Each of these matters is dealt with in greater detail below.

**Strategic Site Allocations: Policies S1 & S2 + Site Allocation Policies A1-A9**

2.58 The proposed changes to the strategic site allocations include sites which cannot be considered deliverable (as defined by the NPPF at para 47, footnote 11). Proper consideration in determining the appropriate sites to be allocated should have resulted in the inclusion of Onslow Park, which can be considered deliverable as per the NPPF definition, as it is:

• Available now and can be delivered within five years of permission;
• Represents a suitable location for development now which adjoins the Guildford urban area; and
• Lacks development constraints, and so is viable.

2.59 Our representation of July 2016 (attached as an appendix to these representations, and which remain relevant) identified the compelling reasons why that draft of the local plan included inappropriate strategic sites and should be amended to include Onslow Park. It is our position that the changes made have not addressed the issues that we identified, namely:
• SUSTAINABILITY: Onslow Park is a sustainable urban extension (to be built on the principles of a garden village). Sustainability should be a key factor in determining the appropriate sites and for the reasons included in our previous representations and prospectus document, it is maintained that Onslow Park would be more sustainable than many of the allocated sites. We also consider the weight attached to sustainability should be greater in the assessment of options undertaken as part of the Sustainability Appraisal. As a result of this, we believe Onslow Park should have secured an allocation in this draft of the local plan.

• GREEN BELT RELEASE: In determining which sites should be released from the Green Belt, there are clear national guidelines that should be taken into account. High priority should be given to the permanence of creating strong defensible boundaries. A number of allocated sites for Green Belt release do not benefit from existing strong boundaries which would prohibit logical release. Onslow Park benefits from strong defensible boundaries in the form of Guildford urban area, the A25 and mature woodland. As such, its release would be logical and help effectively maintain the permanence of the Green Belt through the prevention of urban sprawl.

• PREVIOUS DEVELOPMENT: The Onslow Park site has already been considered and granted certain development permissions including the existing park and ride site (which was built on the site and is part of the green belt), the sports and health club, the car park, the machinery sheds and the golf course.

• INFRASTRUCTURE REQUIREMENTS: We have submitted traffic studies and correspondence from Highways England and Surrey County Council that establishes that little traffic work is required and importantly development at Onslow Park will not put a further burden on the A3. The information shows the allocation would work well in conjunction with Gosden Hill allocation and performs equally well. The other strategic sites have costly and uncertain infrastructure obligations and as such Onslow Park would make a more suitable strategic site.

• AFFORDABLE HOUSING AND PRIVATE RENTAL STOCK: We have suggested that Onslow Park could have a higher allocation of affordable housing and rental stock to assist Guildford in meeting its needs in this important area. The West Surrey SHMA (September 2015) sets out that Guildford has the greatest unmet affordable housing need within the housing market area, of 1,313 dwellings. The latest Annual Moniotring Report and the 2017 addendum to the SHMA show that affordability issues continue to worsen. The Council should be increasing the delivery of housing and affordable housing to help tackle this issue, which is contrary to the proposed amendments to the Plan. It is not clear that the changes made to the local plan have addressed this issue from Guildford’s perspective, particularly with regards to the early years of the plan. Onslow Park has the potential to increase significantly the provision of specialist forms of housing for the elderly and private rented, discount market rented and starter homes as well as family homes.

• SOCIAL INFRASTRUCTURE: Whilst all allocated sites have some degree of social infrastructure and there have been certain changes made in this draft of the plan, none of the allocated sites can match the social infrastructure proposals of Onslow Park, particularly as its proximity to Guildford would allow Guildford town residents to enjoy the of sports, education, recreation and other facilities and vice versa.

• DELIVERY: As detailed in these representations, there are likely to be significant constraints on the certainty and rate of deliverability of some of the 5 largest strategic sites included in the local plan (which account for 64% of the housing supply included in the plan). The changes made to the plan have not improved the issue of deliverability, and therefore it is important include Onslow Park and achieve relative certainty of delivery of homes in the early stages of the Plan.

2.60 We note the sustainability appraisal has been updated as part of the current consultation. However, of the options and scenarios tested, although a number support the inclusion of Onslow Park, the way the options are construsted does not reflect the level of housing need we consider should be provided and in addition are structured in such a way as to not allow for the proper consideration of Onslow Park as an alternative to one or more of the proposed sites which are considered simply as part of the baseline. The study also assumes a generally increasing level of impact pro-rata to the level of development proposed. This is not likely to be the case as sites in less sustainable locations or which impact on national or international level sites and designation will by definition have a greater impact and be less sustainable.

2.61 The assessment also fails to properly reflect the beneficial effect of locating development close to the urban area, where mixed use development can contribute in broad terms to economic, social and environmental infrastructure and achieve a wider public benefit.
3.2 We conclude that the proposed amendments to the plan fail to make it sound. As presently drafted, the plan would be ineffective at meeting the boroughs housing and infrastructure needs for the first two thirds of the plan period. A review of sites selected through the spatial strategy and sustainably assessment should be undertaken.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 170724_Onslow_Park_Reps__targeted_consultation_on_LP_with_app_Redacted.pdf (2.4 MB)

---

Comment ID: pslp171/2642  Respondent: 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)
Agent: Woolf Bond Planning (Thomas Rumble)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to the overall housing requirement on the basis that it fails to adequately reflect the Borough’s true objectively assessed housing need, make an appropriate adjustment for market signals or generate a 5 year housing land supply for the Borough. We also object to the proposed phasing of the annual housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3525  Respondent: 17466593 / Woodcock Bros Wimbledon Limited (Sir or Madam)
Agent: Woolf Bond Planning (Thomas Rumble)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Suggested Residential Opportunity at Former Highlands Nurseries, Portsmouth Road, Ripley
My client controls land at the former Highlands Nurseries, Portsmouth Road, Ripley site extending to approximately 1ha. The attached Location Plan shows the extent of the site and context of the surrounding area. In addition, a satellite view of the site is provided below.

(IMAGE)

The site comprises vacant land previously used for nursery purposes, located in the Green Belt. It is not presently in any private or publicly beneficial use. It forms a field contained on its western side by existing vegetation and on its northern and southern sides by residential properties fronting onto Portsmouth Road. It benefits from an existing vehicular access direct onto Portsmouth Road and lies between the settlements of Ripley and Send Marsh. The site is located entirely in Flood Zone 1 and unlike much of Ripley Parish is not located in the Conservation Area or in close proximity to any listed buildings.

Proposals
These representations are accompanied by the following drawings:
• Location Plan
• Site Plan
• Typical Street Scene.

The proposed scheme includes 7 no. affordable dwellings as part of the overall 20 no. dwellings proposed. The illustrative mix underpinning the proposed site plan comprises:
• 2 no. 1 bedroom affordable maisonettes;
• 2 no. 1 bedroom affordable apartments;
• 3 no. 2 bedroom affordable apartments;
• 6 no. 3 bedroom market semi-detached houses;
• 1 no. 3 bedroom market detached house; &
• 6 no. 4 bedroom market detached houses.

The above housing mix enables the provision of a high proportion of the site to come forward as affordable accommodation, whilst providing a mix of housing sizes, tenures and types such that a mixed community could form.

The layout plan shows 20 no. dwellings proposed in a verdant landscaped setting. The use of the existing access point enables the retention of the existing trees on the site’s frontage adjacent to Portsmouth Road. As illustrated further landscaping can be introduced throughout the development and in particular on the site’s boundaries.

The layout illustrates frontage development that follows the existing building line defined by Thirlestane to the north and Broom House to the south. In this respect, the scheme forms infill development that would read as frontage development located beyond existing trees when viewed from Portsmouth Road. Moving further west, the scheme becomes one of a more conventional low density residential estate, with all dwellings benefiting from generous amenity space and parking provision.

The street scenes provided show the proposed dwellings to comprise two storey development with no rooms in the roofspace, consistent with the prevailing scale in this part of the village. In addition, pitched roofs, gabled features and a variety of materials are proposed so to provide a traditional design and add architectural variety to the development. The site is well contained and is bound by existing residential development. I therefore write to offer the site as a potential allocation for a residential scheme within the emerging Local Plan.

Summary

In summary, the proposed site represents an opportunity to provide a low to medium density housing development on a self-contained site bound by existing residential

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Highlands Nursery - Coloured Site Plan.pdf (1.2 MB)
- Highlands Nursery - Street Scene.pdf (1.2 MB)
- 16-P1258-LP (Location Plan) 10.02.16.pdf (52 KB)
The latest Proposed Submission Local Plan sees a reduction in overall housing numbers from 13,860 during the previously proposed plan period 2013-33 (20 years), to 12,426 homes during the plan period 2015-2034 (19 years). The annualised figure is 654 dwellings per annum in the current Local Plan, as opposed to the 693 dwellings per annum previously proposed.

We understand that an update to the Council’s Strategic Housing Market Assessment (SHMA) has led to a revised objectively assessed need (OAN) figure for the borough. We understand that this is primarily as a result of economic growth forecasts suggesting that employment growth will be less than previously anticipated.

The Planning Practice Guidance (PPG) advises that the DCLG’s household projections should provide the starting point estimate of overall housing need. Given that the 2014-based household projections predicts more growth in Guildford than the 2012-based household projections (on which the previous housing targets were based), it does not follow that the overall OAN figure for the borough has been reduced in the current iteration of the Proposed Submission Local Plan.

The updated SHMA (Guildford Addendum Report 2017, prepared by GL Hearn) reports an upward adjust for market signals of just 9%. It is clear that the market signals adjustment to the borough’s OAN should be significantly higher given the acute affordability issues in the borough.

We are also mindful of the Inspector’s criticisms of Waverley Borough Council’s approach to housing numbers during its recent Examination in Public on its Local Plan. Waverley, Woking and Guildford are included with the 2015 SHMA and together comprise the HMA on which the OAN is based. The Inspector was critical of Waverley Borough Council’s approach in addressing unmet housing need from Woking and also expressed concern at the serious problem of affordability. As a result of the Inspector’s comments, housing numbers are being increased from 519 dwellings per annum to 590 per annum.

This approach is wholly at odds with the approach to housing delivery being taken across Surrey, where Local Planning Authorities have identified that their OANs will increase and they are planning accordingly for enhanced growth. Guildford borough directly adjoins these local authority areas, with Guildford continuing to be one of the most popular, but expensive places to live in Surrey. Planning for less housing than previously proposed is counter-intuitive and flies in the face on proactively dealing with the nation’s housing crisis. Guildford Borough Council should be seeking to exceed and not simply meeting the minimum growth requirements of the borough, this is particularly relevant given previous delivery rates.

GBC has also not built in flexibility into the delivery of the housing within the Plan in case some sites do not come forward or do not come forward quick enough.

For these reasons, we consider that the housing target proposed by Guildford Borough Council is wholly inadequate. It fails to meet the Borough’s fundamental housing needs and further, it does not seek to boost significantly the supply of housing, as required by the provisions of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 22680003_Land at Liddington Hall_Part1.pdf (1.2 MB), 22680001_Draft Policy 2.pdf (408 KB)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )
Inclusion of Liddington Hall site

Liddington Hall was removed from the previous Proposed Submission (Regulation 19) version of the Local Plan and has not been re-inserted. We believe this renders the Plan unsound given the council should be planning for more housing and is surprising given that:

• The site is in a sustainable location on the edge of Guildford and within easy reach of the Fairlands Estate.

• It is well-served by local bus routes with good cycling connections to the town centre. It is within walking distance of the local facilities in Fairlands;

• In view of the potential capacity of the site (as acknowledged by the Council) for approximately 600 dwellings, there is the potential to further enhance the connectivity of the site for sustainable modes of transport as part of any redevelopment of the site;

• The existing footpaths already connect the site back in to adjoining residential areas;

• The site is effectively surrounded on three sides by existing development and two streets of existing development extend into the site from Aldershot Road;

• The substantial tree belts and small copses on the western and southern boundary, together with the settlement edges and road corridors on the northern and eastern boundaries establish a sense of containment to the site;

• The site has clear defensible boundaries and an appropriate Masterplan for the site could provide a robust green edge;

• The site has a very limited role in preventing the merging of Guildford and Fairlands;

• The site has only a limited role in containing the sprawl of urban areas;

• The site plays no role in preserving the setting and special character of an historic town;

• The site is not subject to any landscape-related, ecological, archaeological or heritage designations;

• None of the land is high grade agricultural land (predominantly grade 3 with some grade 4);

• The site is not a flood zone;

• The land is under single ownership (the college). The college would be committed to bringing forward the site as soon as the Plan is adopted;

• Residential development of the site would be compatible with adjacent residential land uses;

• There is sufficient existing highways capacity to accommodate development;

• Appropriate access into the site can be achieved; and

• The site is available for development and deliverable within 1-5 years, with no insurmountable obstacles to delivery in terms of infrastructure, highway improvements, ground contamination or ecology.

Removal of Merrist Wood Campus from the Green Belt

There is a continuing need to rationalise and modernise the college campus to protect its longevity into the future. The College has suffered from under-investment for a number of years. The College are currently exploring development plans with the council through the pre-application process to expand and modernise the campus. These current development plans will ensure that the college is allowed to maintain and improve its facilities and realise capital funds, to secure its long-term future.
It is therefore important that the emerging Guildford Borough Local Plan allows for the continual evolution and current growth plans for Merrist Wood. Our contention is that the Merrist Wood campus should be inset from the Green Belt as has been proposed for other major developed sites in the Green Belt. The Merrist Wood campus is larger, with more built development than many of the other major developed sites that have been proposed to be inset from the Green Belt. The campus is well contained in the landscape with opportunities on its own land to strengthen defensible boundaries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- 22680003_Land_at_Liddington_Hall_Part1(1).pdf (1.2 MB)
- 22680001_Draft_Policy_2.pdf (408 KB)

**Representations to Guildford Borough Proposed Submission Local Plan: strategy and sites (2017)
Land at Foxburrow Hill Road, Guildford**

We are writing on behalf of our client Mr Robert Howard in response to the above consultation document.

Our client has land interests in the southern part of the Borough, immediately adjacent to the boundary with Waverley Borough Council and close to the settlement of Bramley. We have previously responded to the Council’s consultation on its SHLAA and Draft Local Plan (2014) on our client’s behalf with details of this land interest which we consider to have medium to long term potential as a housing site. In particular, we consider that the site has the potential to deliver a variety of housing types to meet the needs of the ageing population and the family housing market, for which there is significant projected growth identified.

With regards to the latest Proposed Submission Document, we acknowledge that comments should only refer to the changes from last year’s consultation. These changes include:

- the total housing target being reduced by 1,400 units for the period up to 2034 – a total of 12,426 homes compared to 13,860 last year;
- a reduced housing need from 693 to 654 units per year;
- some key housing sites being removed from the plan;
- a reduction in the number of homes allocated on Green Belt land during the plan period by 1,850; and
- updated sites with increased numbers of homes on brownfield land.

From our review of the Proposed Submission Document our key concerns are the reduction in the overall housing numbers, the increased focus of housing on brownfield sites and the removal of identified safeguarded land from the Green Belt. We address each of these points in turn below.

**Reduced Housing Numbers**

As we set out in our previous representations to the Draft Local Plan Document in 2014, we consider there is a clear need to respond to the growing housing demand in the Borough. As such, we are concerned that the reduction of the overall housing target could result in unmet need over the plan period. Furthermore, the decision to reduce the number of homes delivered on Green Belt land and increase housing numbers on brownfield sites will result in the Council delivering a significant proportion of high density residential schemes and a limited future supply of family housing for which there is already an acute shortage.
From our review of the proposed housing sites listed in the consultation document we consider there is an over-reliance on brownfield sites, which are more likely to deliver high density residential development and little in the way of family and affordable housing. Moreover, we are concerned that the economic base of Guildford town centre is becoming increasingly dominated by residential uses, making the local economy less varied, less robust, and more vulnerable. In this respect, the Local Plan needs to balance the need for housing with the need for employment and retail space, and we doubt that such a balance can be achieved with the current strategy.

In addition to the above, it is also evident that additional sites which are not subject to the same financial viability issues (which affect so many urban sites) would provide more certainty in terms of availability and deliverability, especially in relation to securing a range of dwelling types and sizes that meet the diverse housing needs of the Borough. It is our firm belief that taking an inflexible protectionist approach towards Green Belt release will undermine the need to deliver sufficient development to meet the growth requirements of the Borough.

With regards to dwelling mix, we note that the Council’s SHMA 2015 and Addendum Report 2017 shows that there is a need for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes. The Borough also has an ageing population with a significant projected growth in the over 65 year olds and an estimated need for 1,061 specialist homes accommodation for older people over the plan period. As such, there is a clear danger that the above mix will not be met if the Council seek to increase the number of units on previously developed sites in urban areas which will primarily deliver high density one and two bedroom flats.

Whilst we do not object to the redevelopment of each and every residential site within the urban area, it is nevertheless the case that a strategy of seeking to maximise urban opportunities purely to avoid the release of sites within the Green Belt has a negative impact on the diversity and balance of land uses within the town centre, to the detriment of both the quality of life of residents and the inherent sustainability of that urban area, which is derived in no small part from the availability of a range of local facilities, and the availability of a range of housing types.

Safeguarded Land

We note that the areas of safeguarded land previously identified in the Draft Plan (2014) have been removed from the Proposed Submission Document without any justification. We strongly object to the deletion of safeguarded land and believe it is vital that the Borough identify suitable safeguarded sites within the Local Plan.

As noted in the NPPF (paragraph 85), LPAs should, where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. In the case of Guildford Borough Council, we strongly believe this is necessary particularly given the severe housing shortage and the proportion of green Belt land within the Borough (89%).

Whilst we acknowledge the loss of Green Belt land is politically unpopular, what is needed in the forthcoming Local Plan is the foresight to identify an appropriate range of safeguarded sites which will cater for the diverse and growing needs of the Borough’s population and provide a degree of certainty going forward. In this respect, safeguarded land will reduce the need to amend Green Belt boundaries again at the end of this plan period and help to meet the longer term development needs stretching beyond this plan period.

Taking the above into consideration, we wish to use this opportunity to reiterate that our client’s site should be considered for safeguarded land. The site can deliver a full range and size of housing types including affordable housing and much-needed family housing, within an attractive landscaped setting. The site is also in single ownership and is not constrained by any financial limitations or burdens. As such, the site genuinely has the potential to accommodate housing development during the forthcoming Plan period, if necessary.

In addition to the above, we highlight that our client’s site is in a sustainable location for housing development given its relationship to existing settlements and close proximity to local services and public transport links. We also highlight that the site was formerly used as a sewage works and therefore can be considered as previously developed land. With regards to impact on the Green Belt, we note that the site is within an area of Green Belt (Ref: F4) identified as an area of “low sensitivity” in the Council’s Green Belt and Countryside Study (2013). The site also scores 0 with regard to serving Green Belt purposes.

Summary
For the reasons set out above, we strongly object to the proposed reduction of housing numbers together with the increased number of homes on brownfield sites and the removal of safeguarded land. Furthermore, we believe that a strategy of seeking to maximise urban opportunities purely to avoid the release of sites within the Green Belt will ultimately have a detrimental impact on the quality of life of local residents, particularly young families requiring suitable family housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1429</th>
<th>Respondent:</th>
<th>17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>Vail Williams LLP (Jane Terry)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( No ), is Sound?</td>
<td>( No ), is Legally Compliant?</td>
<td>( )</td>
</tr>
</tbody>
</table>

**REPRESENTATIONS MADE ON BEHALF OF GLEESON DEVELOPMENTS LTD AND MR AND MRS T POULSOM**

**SPATIAL VISION AND POLICY S2: BOROUGH-WIDE STRATEGY**

Reference should also be made to the HBF representation which, as members, we fully support.

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;

This figure was then adjusted to include:

- Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;

- Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;

The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that 'Uncertainty will
continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the borough and that these should revert to the 2015 West Surrey SHMA figures.

**Duty to Cooperate**

In our previous representations we highlighted the reference made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Cooperate can be considered to be appropriately discharged.

**Five-year Supply of Housing Land**

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect.

Where there is scope to increase the quantum of development on the proposed allocations this should be considered and an adjustment made to the numbers accordingly.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s ’Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2703  Respondent: 17528705 / Gleeson Developments LTD and Mr and Mrs T Poulsom
Agent: Vail Williams LLP (Jane Terry)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

SPATIAL VISION AND POLICY S2: BOROUGH-WIDE STRATEGY

Reference should also be made to the HBF representation which, as members, we fully support.

Objectively Assessed Housing Need

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;
- This figure was then adjusted to include:
  - Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;
  - Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;
- The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 West Surrey SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the borough and that these should revert to the 2015 West Surrey SHMA figures.

Duty to Cooperate
In our previous representations we highlighted the reference made in the Housing Delivery Topic Paper to the Memorandum of Understanding on housing delivery which was signed by the three authorities in the Strategic Housing Market Area, Guildford, Waverley and Woking. The MoU recognised that there is unmet need within the HMA and committed the three authorities to continued joint working to ensure housing needs across the HMA are met in full.

It is therefore also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the view expressed in the Topic Paper that Guildford is unable to sustainably accommodate any unmet need arising from Woking despite a rigorous justification to support that view, and the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough. Further scrutiny of the constraints and opportunities for accommodating further development within Guildford to meet the overall needs of the SHMA must therefore be undertaken before the Duty to Cooperate can be considered to be appropriately discharged.

Five-year Supply of Housing Land

The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan is therefore currently considered unsound in this respect. Where there is scope to increase the quantum of development on the proposed allocations this should be considered and an adjustment made to the numbers accordingly.

Soundness

As a consequence, of the discussions above, objection is made to the Plan’s ‘Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034.

The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to at least the level set out in the 2016 draft Plan i.e. ‘at least 693 dpa’ but with a further allowance to cover the current shortfall in housing land supply (881 units) plus a 10% buffer to secure flexibility and resilience across the Plan period.

Further points of observation and objection are set out below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3263</th>
<th>Respondent:</th>
<th>17580289 / Linda Carter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The stated provision for the revised number of houses is 12,426 which I believe is still excessive particularly when the report by Neil McDonald on the West Surrey SHMA is taken into account.

The figure 4.1.9a Annual Housing Target shows the housing number totals 9810 over the Plan period. This is a discrepancy of 2616 - why?

I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. Housing

1.1 Reference should also be made to the HBF representation which, as members (both Vail Williams and Thakeham Homes), we support. Importantly, the evidence base underpinning the Council’s OAN has recently been updated as part of the March 2017 West Surrey Strategic Housing Market Assessment: Guildford Addendum (2017 SHMA). This is proposed to replace the findings of the 2015 West Surrey Strategic Housing Market Assessment (2015 SHMA).

1.2 It is considered that there are a number of issues with the Council’s OAN and the evidence base underpinning it. These are separated into the various components of OAN below. RPS are also acting on behalf of Thakeham Homes in the Borough. These representations make reference to observations made by RPS and detail a number of issues with the Council’s OAN including the evidence base underpinning it. These are separated into the various components of OAN below.

Five year Supply of Housing Land
1.3 The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan should be declared unsound.

**Soundness**

1.4 As a consequence of the discussions below, objection is made to the Plan’s ‘Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduce the delivery of homes from 13,860 to 12,426 in the period to 2034.

1.5 The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly, the Plan should be found unsound. However, this is based upon the published information and our observations from the recent Examination by an Inspector into the Waverley Borough Local Plan, which is an authority within the joint SHMA area affecting Guildford Borough.

1.6 There are a number of concerns with the Council’s OAN and the evidence base underpinning it including unmet housing need, balancing housing and jobs and market signals and affordability. Our clients have commissioned experts in the field to look at the detail which is referred too within separate representations, however we may wish to address the Inspector at Examination in relation OAN.

**Objectively Assessed Housing Need**

1.7 The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:

1.8 The SHMA calculated an expected employment growth of 13,860 in the borough 2013-2033 giving rise to 693dpa; this figure was then adjusted to include:

i. Affordability pressures - Both across the HMA and in Guildford Borough, affordability has long been recognised. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year with a significant proportion of these being younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to 2001 level arising in a need of 668 dpa;

ii. Student growth - Anticipated growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation; and

iii. The Guildford Addendum Report 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

1.9 The Council have also departed from the plan period for the wider Housing Market Area (HMA). In order to maintain consistency with the HMA and ensure alignment of the plan period in West Surrey, it is recommended that the base date of 2013 is reinstated, to operate until 2033 rather than 2015-2034 in the current draft.

**Unmet Housing Need**

1.10 The Council’s evidence base makes no reference to unmet needs arising from outside the Borough, instead taking the view that the Borough will only address its own need. This notion was recently tested through the Waverley Local Plan Examination, where there are clear parallels for the role of Guildford to take further need from outside the Borough.

1.11 As part of the Waverley Local Plan Examination, the extent of Woking’s unmet need was brought under scrutiny, as it became clear that there were no mechanisms in place to address housing shortfalls arising from the Borough.

**Duty to Cooperate**
1.12 It is of some concern that this Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. It was suggested that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently, there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. The Waverley Local Plan Examination determined that there was a shortfall of available housing supply in Woking which was not able to be met though the plan period. The Waverley Local Plan Examination hearings determined that the extent of this shortfall equated 166dpa and it was proposed that Waverley accommodated 50% of this (83dpa therefore resulting in an extant shortfall of 83dpa.

1.13 Importantly, Paragraph 4.1.9a of the Proposed Submission Local Plan states that in relation to the proposed housing requirement of 12,426 over plan period to 2034, ‘this is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period’. This therefore indicates that Guildford Borough may have capacity to accommodate the unmet needs of Woking Borough alongside Waverley Borough.

1.14 Neither Waverley nor Guildford appear to be taking their Duty to Cooperate seriously in this respect, a concern demonstrated by the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. The recent Waverley Examination suggested that they will be accommodating half the unmet need of Woking. Guildford has the ability to accommodate further dwellings including accommodation of some of the needs of Woking Borough Council. As a result of the debate at the Waverley Examination, Guildford should proactively plan for the housing need.

1.15 Much like Waverley, it is clear that Guildford also has links to the London Boroughs which may warrant consideration of further unmet needs. Figure 4 of the 2017 SHMA identifies that net inward migration from the London Boroughs has been consistently positive for the past 15 years.

Market Signals and Affordability

1.16 The 2017 SHMA does not properly reflect the affordability constraints in the Borough and responds to this indicator through an insufficient uplift to the OAN. The following paragraphs have been put together with input from RPS on behalf of Thakeham Homes:

1.17 The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers). What this is, in effect, is an adjustment to the 2014-based household formation rates in the 25-34 age cohort. Whilst this is a necessary adjustment to make to compensate for embedded suppression in the ONS household projections as indicated above, this is not an appropriate adjustment for the purposes of addressing affordability issues in the Borough.

1.18 The 9% increase on the employment-led OAN is a tokenistic gesture and gives no certainty that affordability issues will be addressed in the Borough. The adjustment proposed by the Council seeks to address affordability associated with suppression of people aged 25-34, however affordability is not limited to these groups alone, and exists across the board in Guildford.

1.19 The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

1.20 The uplift of 9% is not grounded in evidence that this uplift this will address affordability issues and as identified above, the uplift is limited only to a single age group.
1.21 One way in which this could be addressed is through consideration of the Local Plans Expert Group (LPEG) methodology, proposed as part of their recommendations to Government in their March 2016 report. This includes a sliding scale of market signals adjustments, based on the severity of housing affordability, through consideration of LQ house prices and LQ house rents.

1.22 Using this methodology, the Council exhibits significant affordability issues and would fall under the category for 25% market signals uplifts. Given the severity of the affordability imbalance in the Borough, it is considered that the 25% uplift should be the minimum that is applied. This is considerably higher than the 9% figure proposed by the SHMA and highlights the shortcomings of the Council’s evidence.

1.23 In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

**Balancing Housing and Jobs**

1.24 The Council’s demographic trends identify a need for 55dpa, which the Council consider in the context of future job growth. The Council uses a blended jobs forecast (taken from Experian, Cambridge Economics and Oxford Economics) to derive an annual job growth of 0.7%. Applying this to assumptions of economic activity, unemployment and commuting, the Council takes the view that the OAN should increase to 577dpa (+20dpa). RPS does not consider that this is a valid approach to take.

1.25 Data provided by the Office of National Statistics (ONS) provides estimations of workplace job change over previous years. The latest data, covering the years 2000-2015 indicates that there has been an average job growth over this period of 0.9%. This is somewhat higher than the Council’s employment growth forecast of 0.7% and the Council has not justified why it is relying on a jobs growth figure lower than the previous rates of growth.

1.26 It does not appear that the Council has given due regard to past trends and how this could influence future job growth. This needs to be more fully explored before the Council proceed with a jobs-led housing strategy for growth.

Further points of observation and objection are set out below.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2089  **Respondent:** 17976417 / Thakeham Homes (Sir or Madam)  **Agent:** RPS Planning & Development (Cameron Austin-Fell BA)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

1.1 These representations to the Council’s Further Regulation 19 Local Plan are made by RPS Planning and Development (RPS) on behalf of our client Thakeham Homes Ltd (Thakeham). This site has been previously promoted by the landowner and a submission was made to the Council as part of the July 2016 consultation of the Local Plan.

1.2 In drafting the Local Plan, the Council will be mindful of the requirements of paragraph 182 of the NPPF, which sets out the rigour that the Council must adhere to in order to meet the tests of soundness. This requires that plans are positively prepared, justified, effective and consistent with national policy. RPS has set out a range of issues with the current drafting of the Guildford Local Plan which need to be addressed in order for the plan to be properly justified and...
effective as a tool to shape growth in the Borough. The Plan does not provide sufficient certainty that the Local Plan is capable of delivering growth which sufficiently boosts the supply of housing, as required by paragraph 47 of the NPPF and has not been prepared positively.

1.3 In particular, RPS has a number of concerns with Guildford Borough Council’s (the Council) current proposed strategy in the current Local Plan and considers that the Council is not presenting an honest appraisal of the level of growth required in the Borough. RPS considers that the housing need for the Borough is indeed higher and consequently, there is a need for additional sites to be delivered through the plan period.

1.4 As a response to the shortfall in housing supply, Thakeham proposes Land at Fairlands as a considered and appropriate location for further housing growth. Land at Fairlands was previously included as Safeguarded Land in the 2014 Draft Borough Local Plan, however this has been removed from the current consultation document. RPS considers that the site needs to be reconsidered as a future growth site in the Local Plan, which will assist in addressing shortfalls in the Council’s delivery and also assist in delivering wider benefits to the Guildford area, including a proposed Park and Ride facility.

1.5 The details of this proposed Park and Ride is included within the Fairlands Delivery Document (Appendix 1) which also includes an illustrative masterplan for development and technical studies which support the deliverability of the site. The further supporting technical documents are also included with his submission:

- Air Quality Assessment (Appendix 2.1);
- Desk Based Heritage and Archaeological Assessment (Appendix 2.2);
- Ecological Deliverability Note (Appendix 2.3);
- Landscape, Visual Appraisal and Green Belt Review (Appendix 2.4);
- Noise Risk Assessment (Appendix 2.5);
- Surface Water Drainage Assessment (Appendix 2.6);
- Transport Feasibility Assessment (Appendix 2.7); and
- Utilities and Foul Water Drainage Assessment (Appendix 2.8);

1.6 It is considered that Land at Fairlands is an appropriate location for future growth and is necessary to provide the Council with a greater cache of housing land, deliverable within the plan period of the Guildford Local Plan.

1.7 These representations explore these matters in more detail, along with consideration of other policies in the consultation Local Plan. For ease, the sections of this report mirror the format of the Council’s Regulation 19 consultation document.

2 OBJECTIVES AND VISION

2.1 The Council has set out in its vision a strategy for growth in the Borough. A strategy which should support the necessary requirements for housing and employment across the plan period. As part of the recent changes to the Plan, the Council has amended its plan period from 2013-2033 to 2015-2034.

2.2 Whilst this only includes a reduction of 1 year to the plan period, it is moving away from aligning with the wider Housing Market Area (HMA) which includes Woking and Waverley. The Council has already established through the 2015 Strategic Housing Market Assessment (2015 SHMA) that there are functional housing relationships between the three authorities in West Surrey and, accordingly, the joint study has been undertaken to establish the housing need for these areas.

2.3 What is also known is that Woking is significantly constrained in its ability to meet its own housing need and has requested that Waverley and Guildford consider how they may be able to assist in meeting any shortfalls arising from Woking Borough.

2.4 With a revised plan period, it becomes more difficult to establish what the housing need is across the HMA and the role of Guildford in discharging it’s duties under the Duty to Cooperate in meeting any necessary unmet need. For the sake of consistency across the HMA, it is proposed that the Council revert to the original 2013-2033 plan period, which is better aligned with Waverley and Woking.
3.1 The Council’s current strategy for growth seeks to focus growth towards the most sustainable settlements, including Guildford as the principal location for development. After Guildford, development is proposed to urban areas followed by growth to the villages.

3.2 Though RPS agrees that development should be directed to the largest centres, the proposed strategy is not sufficiently nuanced to allow for growth in sustainable villages within close proximity to Guildford.

3.3 Although the Council has identified locations adjacent to Guildford for proposed allocations, RPS considers that Fairlands is an appropriate location on the edge of the town, capable of supporting further growth as part of an urban extension strategy.

3.4 The Council’s own evidence recognises the sustainability of Fairlands as an appropriate location to direct new growth to. The Guildford Settlement Hierarchy Study (2014) identifies Fairlands as appropriate and capable to support new development. The consideration of the site as a sustainable location is also mirrored in the Council’s Green Belt and Countryside Study Vol V (2014) which recognises that the settlement is supported by a number of services and a good public transport system (paragraph 24.65 refers).

3.5 As part of the Council’s Draft Local Plan (2014), Land at Guildford was included as an appropriate location for Safeguarded Land, to be removed from the Green Belt in the event that further land was necessary for development. RPS considers that the Council was correct to identify this land, as a sustainable location, capable of supporting the expansion of Guildford. As a response to this Thakeham has prepared a Delivery Document for promoted land at Fairlands (Appendix 1), which can deliver up to 550 dwellings in the plan period, along with other sustainability benefits including a SANG and land for a Park and Ride system.

3.6 Under the current provisions in the plan, Fairlands is included as a Rural Local Centre, however this settlement is strategically placed to accommodate further growth at Guildford and should be considered as an urban area for the purposes of the Local Plan.

3.7 Guildford is constrained to the south of the town by the Surrey Hills Area of Natural Outstanding Beauty (AONB) which restricts how the town can grow. The Council is already proposing growth to the east, north and west of Guildford. In order to provide a balanced mix of sites, Fairlands provides a further location for growth which is within close proximity to the town along the A323 and is considered to be a sustainable settlement for Green Belt release as part of the Local Plan.

3.8 Accordingly, RPS considers that Fairlands should be recognised as a potential growth location to serve the expansion of Guildford which should be amended as part of this policy

**Objective Assessment of Need for Housing**

3.9 One of the more significant changes presented in the submission is the reduction in the Objectively Assessed Need for Housing (OAN) presented as part of emerging Policy S2.

3.10 This indicates a reduction from 13,860 dwellings to 12,426 dwellings, a reduction of 1,434 dwellings. As previously noted, one area affecting this is the change in the plan period from 2013-2033 to 2015-2034, which reduces the plan period by one year. In considering this as an annual requirement, the OAN has now decreased from 693dpa to 654dpa.

3.11 For the reasons outlined in Section 2, RPS does not consider this to be a sound adjustment, as this is a departure from the plan period for the wider Housing Market Area (HMA). In order to maintain consistency with the HMA and ensure alignment of the plan period in West Surrey, it is recommended that the base date of 2013 is reinstated, to operate until 2033.

3.12 Importantly, the evidence base underpinning the Council’s OAN has recently been updated as part of the March 2017 West Surrey Strategic Housing Market Assessment: Guildford Addendum (2017 SHMA). This is proposed to replace the findings of the 2015 West Surrey Strategic Housing Market Assessment (2015 SHMA).

3.13 RPS observes that there are a number of issues with the Council’s OAN and the evidence base underpinning it. These are separated into the various components of OAN below.
Unmet Housing Need

3.14 The Council’s evidence base makes no reference to unmet needs arising from outside the Borough, instead taking the view that the Borough will only address its own need. This notion was recently tested through the Waverley Local Plan Examination, where there are clear parallels for the role of Guildford to take further need from outside the Borough.

3.15 As part of the Waverley Local Plan Examination, the extent of Woking’s unmet need was brought under scrutiny, as it became clear that there were no mechanisms in place to address housing shortfalls arising from the Borough.

3.16 The Waverley Local Plan Examination determined that there was a shortfall of available housing supply in Woking which was not able to be met though the plan period. The Waverley Local Plan Examination hearings determined that the extent of this shortfall equated 166dpa and it was proposed that Waverley accommodated 50% of this (83dpa). There exists therefore, an extant shortfall of 83dpa and RPS consider that this should first be met in the HMA, through Guildford’s Local Plan.

3.17 Much like Waverley, it is clear that Guildford also has links to the London Boroughs which may warrant consideration of further unmet needs. Figure 4 of the 2017 SHMA identifies that net inward migration from the London Boroughs has been consistently positive for the past 15 years.

3.18 There are clear linkages with Guildford and the London Boroughs, which continue to be net importers of labour from the capital. The Council should endeavour to quantify the strength of this relationship which can be converted into an appropriate figure to assist in meeting unmet needs from the London Boroughs as part of the total housing requirement.

Balancing Housing and Jobs

3.19 The Council’s demographic trends identify a need for 55dpa, which the Council consider in the context of future job growth. The Council uses a blended jobs forecast (taken from Experian, Cambridge Economics and Oxford Economics) to derive an annual job growth of 0.7%. Applying this to assumptions of economic activity, unemployment and commuting, the Council takes the view that the OAN should increase to 577dpa (+20dpa). RPS does not consider that this is a valid approach to take.

3.20 Data provided by the Office of National Statistics (ONS) provides estimations of workplace job change over previous years. The latest data, covering the years 2000-2015 indicates that there has been an average job growth over this period of 0.9%. This is somewhat higher than the Council’s employment growth forecast of 0.7% and the Council has not justified why it is relying on a jobs growth figure lower than the previous rates of growth.

3.21 It does not appear that the Council has given due regard to past trends and how this could influence future job growth. This needs to be more fully explored before the Council proceed with a jobs-led housing strategy for growth.

Market Signals and Affordability

3.22 In RPS’ view, the 2017 SHMA does not properly reflect the affordability constraints in the Borough and responds to this indicator through an insufficient uplift to the OAN.

3.23 Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers).

3.24 What this is, in effect, is an adjustment to the 2014-based household formation rates in the 25-34 age cohort. Whilst this is a necessary adjustment to make to compensate for embedded suppression in the ONS household projections as indicated above, this is not an appropriate adjustment for the purposes of addressing affordability issues in the Borough.

3.25 The 9% increase on the employment-led OAN is a tokenistic gesture and gives no certainty that affordability issues will be addressed in the Borough. The adjustment proposed by the Council seeks to address affordability associated with suppression of people aged 25-34, however affordability is not limited to these groups alone, and exists across the board in Guildford.
3.26 The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

3.27 The uplift of 9% is not grounded in evidence that this uplift this will address affordability issues and as identified above, the uplift is limited only to a single age group.

3.28 One way in which this could be addressed is through consideration of the Local Plans Expert Group (LPEG) methodology, proposed as part of their recommendations to Government in their March 2016 report. This includes a sliding scale of market signals adjustments, based on the severity of housing affordability, through consideration of LQ house prices and LQ house rents.

3.29 Using this methodology, the Council exhibits significant affordability issues and would fall under the category for 25% market signals uplifts. Given the severity of the affordability imbalance in the Borough, it is considered that the 25% uplift should be the minimum that is applied. This is considerably higher than the 9% figure proposed by the SHMA and highlights the shortcomings of the Council’s evidence.

3.30 In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

8.1 The summary of supply proposed as part of the Sites chapter in the plan identifies the following locations for growth.

<table>
<thead>
<tr>
<th>Settlement Hierarchy</th>
<th>Proposed Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,285</td>
</tr>
<tr>
<td>Guildford Urban Area</td>
<td>5,104</td>
</tr>
<tr>
<td>Ash &amp; Tongham</td>
<td>1,870</td>
</tr>
<tr>
<td>PDL in the Green Belt</td>
<td>116</td>
</tr>
<tr>
<td>New Settlement</td>
<td>2,000</td>
</tr>
<tr>
<td>Villages</td>
<td>853</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>11,228</strong></td>
</tr>
</tbody>
</table>

8.2 To date, the Council has completed 678 dwellings as part of the plan period 2015-2017, which along with the proposed allocations takes the Council’s total supply to 11,748 dwellings. Even if all of the proposed allocations came forward as expected, this would leave the Council with a shortfall of 678 dwellings (based on an OAN of 12,426), though as indicated by RPS, the actual OAN for the Borough is likely to be far higher, which will only widen the shortfall further.

8.3 The Council’s 2017 Local Area Assessment (2017 LAA) provides a more detailed trajectory on page 8 to indicate when each of the Council’s proposed allocations can be expected to come forward. This table indicates that even when set against a reduced housing target for the next five years, the Council faces a cumulative shortfall in delivery that will not be equalised until 2025/26.
8.4 Notwithstanding a detailed critique of the Council’s proposed supply which RPS reserves the position to do, this highlights a lack of resilience in the Council’s supply of housing. It is therefore necessary for the Council to identify additional sites in order to create a more flexible supply of housing and to this effect, RPS considers that Land at Fairlands is wholly appropriate in order to achieve this aim.

8.5 The full details of the site and the opportunities for development is included as part of the appended Delivery Document (Appendix 1), which highlights the sustainability of the site and the need to remove the land from the Green Belt as part of the Local Plan process. Further information on the site and proposed development is included below.

Land at Fairlands

8.6 Fairlands is recognised as a sustainable location for growth in the Council’s 2014 Settlement Hierarchy Study and shares strong ties with Guildford town to the south east. Fairlands is a settlement with a number of existing services including a primary school, GP and pharmacy, community centre and local retail opportunities. The settlement is served by a number of regular bus services which operate between Guildford and Aldershot which assists in demonstrating the sustainability credentials of the village as a satellite settlement to Guildford.

8.7 Thakeham is promoting land west of Fairlands as a logical location for future development, which can assist in meeting shortfalls in housing delivery in the Borough. This site has been previously promoted through the Local Plan process through submissions made by the landowners, and Thakeham has taken over promotion of the site. Land west of Fairlands has been included in previous stages of the plan process, which was identified as a suitable location in the Council’s 2013 Green Belt study and subsequently identified as Safeguarded Land in the 2013 Draft Local Plan.

8.8 Like most of the settlements in Guildford Borough, Fairlands is enveloped by Green Belt, which has historically constrained development in the village. Thakeham has commissioned a Landscape and Visual Assessment of the site (Appendix 2.4), which has considered the potential landscape baseline, impacts of development and the consistency of the site with the purposes of the Green Belt. The Landscape and Visual Assessment concludes that the site makes only limited contribution to the purposes of the Green Belt and could be developed without eroding the intended purposes of the Green Belt.

8.9 The Landscape and Visual Assessment, along with a number of other technical studies, has informed the production of an Illustrative Masterplan for the site, which indicates how the development could come forward in a way which reflects the local surroundings and provides enhancements to the area.

8.10 Informed by an understanding of the capacity of the site, Thakeham proposes that the site can deliver up to 550 dwellings adjacent to the existing settlement of Fairlands. The site can be brought forward by Thakeham as part of a wider comprehensive development which includes public open space provision, areas for children’s play and SANG. The proposals also demonstrate how the site can accommodate a new Park and Ride adjacent to the A323. The benefits of this service extend beyond the proposed development and will contribute towards easing existing traffic flows along the A323 into Guildford. The proposed masterplan for the site is included in the supporting Delivery Document, which is replicated in Figure 8.1 below.

8.11 The illustrative masterplan demonstrates how the site can be delivered in a comprehensive way. Thakeham considers that the site can be delivered in line with the Guildford Local Plan to support shortfalls in housing delivery and deliver sustainable transport enhancements. This also involves the creation of a new 3-arm roundabout onto the A323 which will provide the necessary capacity to serve the development.

8.12 To achieve this, Guildford will need to use the Local Plan to release the site from the Green Belt and, as demonstrated in Section 5, the site only makes a limited contribution to the purposes of the Green Belt. The site is considered to be wholly deliverable within the timeframes of the Local Plan and Thakeham estimate that, subject to Green Belt release, the site can start delivering the first dwellings in 2022.

8.13 The Council has not made an appropriate assessment of land to the west of Fairlands as a realistic option for housing delivery of the housing strategy for Guildford. As indicated, Thakeham considers that the site should be reconsidered in
the context of the housing shortfall in the Borough and should be included as an further allocation in the Local Plan strategy for Guildford.

(Please refer to Uploaded version)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 27413 Land West of Fairlands LVA GBR 20170720a Combined_Part4.pdf (2.6 MB)
- Appendix 2.3 Ecological Deliverability.pdf (3.3 MB)
- 27413 Land West of Fairlands LVA GBR 20170720a Combined_Part3.pdf (10.9 MB)
- Appendix 2.7 Transport Feasibility Assessment.pdf (2.5 MB)
- Appendix 2.8 Utilities and Foul Drainage.pdf (7.5 MB)
- Appendix 2.1 AQ Assessment.pdf (3.1 MB)
- 27413 Land West of Fairlands LVA GBR 20170720a Combined_Part2.pdf (10.8 MB)
- 27413 Land West of Fairlands LVA GBR 20170720a Combined_Part1.pdf (8.8 MB)
- Appendix 2.5 Noise Risk Assessment.pdf (1.8 MB)
- Appendix 2.2 Heritage.pdf (4.0 MB)
- JBB8470.C5465 Guildford Reg 19 Reps Thakeham - RPS Planning - Policies.pdf (588 KB)
- Appendix 2.6 Surface Water Drainage Strategy.pdf (3.1 MB)
- Appendix 1 Deliverability Document - RPS Planning.pdf (5.5 MB)

Comment ID: pslp171/1163  Respondent: 17979553 / Land to the East of White Lane, Ash (Sir or Madam)  Agent: Vortal Properties Ltd (Robert Symons)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

The Borough wide strategy has reduced the growth targets for housing over the Plan Period to 12,426 new homes.

The delivery of housing over the plan period has been heavily weighted to towards the end of the plan (para 4.1.9a), due to large infrastructure requirements, increasing the likelihood for Guildford Borough to be able to demonstrate a 5-year land supply in the short term.

In the short term, the Council should proactively bring forward identified sites (such as A28) that do not require infrastructure upgrades to help meet local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Weighting of development

Attached documents:

Comment ID: pslp171/3531  Respondent: 18148609 / Office of Rail and Road (Paul Wilkinson)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We have noted the comments you have received back from Network Rail and add the following:

**Land Disposal**

We note that the Guildford Borough plan/strategy includes making use of land owned by Network Rail. One of ORR’s regulatory controls on Network Rail concerns land disposal, our objective being to protect land that may be required for the future development of the railway network and to prevent the disposal of that land against the public interest. Should Network Rail wish to dispose of land it may need to seek our specific consent in order to comply with its network licence. We expect Network Rail to work closely with Guildford Borough Council and all relevant stakeholders in developing its proposals. Details on our regulatory arrangements can be found at: [http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy](http://www.orr.gov.uk/rail/economic-regulation/regulation-of-network-rail/network-licence/land-disposal-policy)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Total records: 2682.